

TSD File Inventory Index

Date: April 25, 2000

Initial: CMK/nevad

Facility Name: <u>GenCorp. Polymer Products Inc. (Gen. Falden Site)</u>			
Facility Identification Number: <u>OH 046 630 679</u>			
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status	Y	.1 Correspondence	
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports)	Y
.3 Part A Application and Amendments	Y	C.2 Compliance/Enforcement	X
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releaseable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	Y
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports	Y
.2 Closure/Post Closure Plans, Certificates, etc		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 1

.5 RFI QAPP		.6 CMI QAPP	
.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8 RFI Progress Reports		D.5 Corrective Action/Enforcement	
.9 Interim Measures Correspondence		.1 Administrative Record 3008(h) Order	
.10 Interim Measures Workplan and Reports		.2 Other Non-AR Documents	
D.3 Corrective Action/Remediation Study		E. Boilers and Industrial Furnaces (BIF)	
.1 CMS Correspondence		.1 Correspondence	
.2 Interim Measures		.2 Reports	
.3 CMS Workplan		F.1 Imagery/Special Studies (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	
.4 CMS Draft/Final Report		G.1 Risk Assessment	
.5 Stabilization		.1 Human/Ecological Assessment ...	
.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
.7 Lab Data, Soil-Sampling/Groundwater		.3 Enforcement Confidential	
D.4 Corrective Action Remediation Implementation		.4 Ecological - Administrative Record	
.1 CMI Correspondence		.5 Permitting	
.2 CMI Workplan		.6 Corrective Action/Remediation Study ...	
.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation ...	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: *Documents do not justify individual folder per schedule*



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

RECEIVED
WMD RCRA
RECORD CENTER

JUN 07 1993

George V. Voinovich
Governor

Donald R. Schregardus
Director

May 17, 1993

Gencorp Polymer Product
Attn: Donald Norman
One General Street
Newcomerstown, OH 43832

RE: EPA ID#: **OHD046630679**

LOCATION of INSTALLATION: *One General St*
Newcomerstown, OH 43832

In response to your request of February 1993 the following information has been updated:

Contact: *Donald Norman (614)498-5900*

If you have any questions, please contact Beth Barrett at (614)644-2977.

Sincerely,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

TEC/bab

cc: U.S. EPA, Region V
Ohio EPA District Office



DAN



GENCORP
POLYMER
PRODUCTS

November 30, 1988

Mr. Valdas V. Adamkus, Administrator
U.S. Environmental Protection Agency
Region V
Federal Building
230 South Dearborn
Chicago, Illinois 60604

RECEIVED

DEC 01 1988

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Subject: GenCorp Inc.
Corporate Name Change

Dear Mr. Adamkus:

By the end of calendar year 1988, DiversiTech General, Inc, a wholly-owned subsidiary of GenCorp Inc., will be merged with its parent company. DiversiTech General will cease to exist as an independent corporation.

I am writing to you on behalf of GenCorp Inc., requesting that your agency change our Corporate name on existing permits and in appropriate files to reflect this corporate name change. Facilities within your Region which will be effected are listed on the attachment showing their previous names and their new names. The addresses of these facilities remain the same.

Please sent me confirmation of these requested name changes. If there are any questions regarding this matter, phone me at (216) 668-7076.

Very truly yours,

GENCORP INC.

Ronald W. Frase
Ronald W. Frase, Manager
Environmental Engineering

RWF519/11:jch

Attachment

cc: David Key - Director, Air Management Division
Charles Sutfin - Director, Water Management Division
William Constantelos - Director, Waste Management Division
William H. Sanders - Director, Environmental Services
Division

Former Name	New Name
DiversiTech General, Inc. Evansville Plant 605 W. Eichel Street Evansville, Indiana 47710	GenCorp Inc. d/b/a GenCorp Polymer Products Evansville Plant

Federal I.D. # IND 006 371 322

DiversiTech General, Inc. Logansport Plant One General Street Logansport, Indiana 46947	GenCorp Inc. d/b/a GenCorp Automotive Logansport Plant
--	--

Federal I.D. # IND 005 106 984

DiversiTech General, Inc. Marion (EED) Plant 1700 Factory Avenue Marion, Indiana 46952	GenCorp Inc. d/b/a GenCorp Automotive Marion (EED) Plant
---	--

Federal I.D. # IND 121 580 542

DiversiTech General, Inc. Marion (RPD) Plant 1700 Factory Avenue Marion, Indiana 46952	GenCorp Inc. d/b/a GenCorp Automotive Marion (RPD) Plant
---	--

Federal I.D. # IND 006 418 271

DiversiTech General, Inc. Wabash Plant One General Street P. O. Box 507 Wabash, Indiana 46992	GenCorp Inc. d/b/a GenCorp Automotive Wabash Plant
---	--

Federal I.D. # IND 005 159 603

* NPDES Permit # IN 0043044

DiversiTech General, Inc. Mogadore Plant 165 S. Cleveland Avenue Mogadore, Ohio 44260	GenCorp Inc. d/b/a GenCorp Polymer Products Mogadore Plant
--	--

Federal I.D. # OHD 085 763 555

Active
Part A

Former NameNew Name*Part A
withdrawn*

DiversiTech General, Inc.
Mogadore Pilot Plant
165 S. Cleveland Avenue
Mogadore, Ohio 44260

GenCorp, Inc.
d/b/a GenCorp Polymer Products
Mogadore Pilot Plant

Federal I. D. # OHD 980 795 348

* NPDES Permit # PH F29*BD

*Part A
withdrawn*

DiversiTech General, Inc.
Newcomerstown Plant
One General Street
Newcomerstown, Ohio 43832

GenCorp Inc.
d/b/a GenCorp Polymer Products
Newcomerstown Plant

Federal I.D. # OHD 046 630 679

* NPDES Permit # OH 0004430

*PB
Call-in*

DiversiTech General, Inc.
Toledo Plant
3729 Twining Street
P. O. Box 875
Toledo, Ohio 43696

GenCorp Inc.
d/b/a GenCor Polymer Products
Toledo Plant

Federal I.D. # PHD 980 279 376

* NPDES Permit # OH 0078221

DiversiTech General, Inc.
Ionia Plant
119 S. Dexter Street
P. O. Box 510
Ionia, Michigan 48846

GenCorp Inc
d/b/a/ GenCorp Automotive
Ionia Plant

Federal I.D. # MID 053 669 040

* This name change will also be required for the NPDES permit.



C.W. Herb, President

August 14, 1986

Mr. Robert Swale
RCRA Region 5
RCRA Activities
P. O. Box 3587 A
Chicago, IL 60690-3587

RECEIVED

AUG 18 1986

U.S. EPA, REGION V

Dear Mr. Swale:

Subject: Part A Hazardous Waste Permit Application
Withdraw - OHD 046 630 679 *G, 13D, PA, 9*

It is the desire of DiversiTech General (formerly GTR Plastic Film Company) to withdraw the permit application for its hazardous waste Part A.

This plant was never a storer or treater of hazardous waste, only a generator.

When the permit request was initiated, we were not sure that we could meet the requirements of the 90-day cycle. But it has been our experience that we have been able to meet the 90-day requirement and no hazardous waste has been stored in the plant for more than 90 days since November 19, 1980.

Please do not hesitate to contact Rick Senra at (614) 498-5900 if you have any questions.

(412) 523-5441

Sincerely,

C. W. Herb
C. W. Herb

CWH:pcj

AUG 06 1986

5HS-JCK-13

Arthur Maupin, Senior Project Engineer
GTR Plastic Film Company
One General Street
Newcomerstown, Ohio 43832

RE: Part A Hazardous Waste
Permit Application
OHD 046 630 679

Dear Mr. Maupin:

We have received information from the Ohio Environmental Protection Agency (OEPA) indicating that your facility may not be subject to the permitting requirements of the Federal Resource Conservation and Recovery Act (RCRA), and that your facility is interested in withdrawing its Part A hazardous waste permit application. If so, please submit a written request for withdrawal of your Part A.

Your request must contain a detailed explanation why the application can be withdrawn. For each process code shown on Form 3, Page 1, Section III of the Part A, you must explain why that process is non-regulated. Some of the more commonly encountered exemptions are described in the enclosure to this letter. If at any time since November 19, 1980, your facility actually conducted treatment, storage, or disposal of hazardous waste subject to 40 CFR 265, a closure plan must be filed for that unit instead of a withdrawal request. Requirements for closure are found in 40 CFR Part 265, Subpart G (enclosed).

If no response is received in this office within 15 days of the date of this letter, we will assume your facility requires a permit. Accordingly, we will continue to process your permit application and you are subject to all the applicable interim status standards contained within 40 CFR 265, and the permitting requirements of 40 CFR 270. This would eventually result in our requiring you to submit Part B of your hazardous waste permit application.

Please do not hesitate to contact Robert Swale of my staff at (312) 886-6591 for assistance if you have any questions. Please refer to this letter, in all telephone contacts and correspondence on this matter.

Sincerely,

David A. Stringham, Chief
Solid Waste Branch

Enclosure

cc: Tom Carlisle, OEPA
Martha Gibbons, OEPA

bcc: J. Brossman R. Strom B. Swale

5HS-JCK-13:B.Strom:GGW:Disk

	TYP.	AUTH.	IL	IN	ML	MS/W	OH	TPS	WMB	WMD
	#1:6-24-86:		CHIEF	CHIEF	CHIEF	CHIEF	CHIEF	CHIEF	CHIEF	DIR
INIT.	YUW	REL								
DATE	7/30/86	7/30								

7/31/86
osp
sw
gwy

5HS-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ronald Frase, Manager
Environmental Engineer
DiversiTech General, Inc.
One General Street
Akron, Ohio 44329

Re: Withdrawal of Part A
(Storage fewer than 90 days)
and Corrective Action
Requirements
Facility Name: DiversiTech General, Inc.
(Formerly General Tire & Rubber)

U.S. EPA I.D. No: OHD 046 630 679

Dear Mr. Frase:

This is to acknowledge the receipt of a letter dated February 8, 1983, requesting the withdrawal of the Part A Hazardous Waste Permit Application for the above referenced facility. The request stated the facility would like to be considered a generator of hazardous waste only, and accumulate those wastes on-site for fewer than 90 days according to 40 CFR 262.34 (enclosed).

Based on the Agency's information, however, the facility has stored hazardous wastes for longer than 90 days at some time since November 19, 1980. Therefore, the facility is subject to the closure requirements in 40 CFR 265 Subpart G and the Hazardous and Solid Waste Amendments for 1984. Your obligations under 40 CFR Subpart G may be satisfied by completing the enclosed "Request for Change in Status", having it signed by an appropriate individual per 40 CFR 270.11 (enclosed).

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to amend RCRA. Under Section 206 and Section 233 (enclosed) of the Amendments, all facilities "seeking a permit" (taken to mean interim status facilities) must provide for corrective action for all releases of hazardous wastes or constituents from any solid waste management unit,

INITIALS	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
	DD 7/11/85	RP 7/11/85		DJB 7/17/85		<i>7/17/85</i> [Signature] 7/22/85		

regardless of the time at which waste was placed in the unit. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2. Under the Cooperative Agreement with the U.S. Environmental Protection Agency (U.S. EPA), the State has agreed to implement the corrective action requirements of the Amendments prior to the State getting formally authorized for the provisions of the Amendments.

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken, or will be taken, pursuant to a decision on your change in status. An important part of our determination includes your willingness (or unwillingness) to sign the enclosed certification statement. Please read it carefully, and either sign it and return it, or return it to us unsigned with a cover letter of explanation. Return both forms within three weeks of the date of this letter, submitting them to the following address:

RCRA Activities
U.S. EPA - Region V
P.O. Box A3597
Chicago, IL 60690-3587

After our receipt of the properly executed change in status certification and corrective action certification, we will publicly notice your change in status and any tentative decision we make regarding releases of hazardous waste or hazardous constituents to the environment will be included in the public notice inviting public comment on our tentative decision. Public notice will be in a newspaper of general circulation in the area of the facility. Upon completion of the public notice period we will notify you in writing of your regulatory status.

This may eliminate the need for a RCRA permit at your facility. Please contact Ms. Lisa Pierard of my staff, at (312)886-6194, if you have any questions.

Sincerely yours,

Edith M. Ardiente, P.E.
Chief, Technical Programs Section

Enclosures: (1) 40 CFR 262.34
(2) Request for change in status
(3) 40 CFR 270.11
(4) Sections 206 and 233
(5) Corrective Action Certification

5HS-13:LPierrard:dd:7/11/85



A GENCORP COMPANY

August 21, 1985

Edith M. Ardiente, P.E.
Chief, Technical Programs Section
RCRA Activities
U.S. EPA - Region V
P. O. Box A3587
Chicago, Illinois 60609-3587

RECEIVED

AUG 26 1985

Subject: DiversiTech General, Inc.
Newcomerstown Plant
U.S. EPA I.D. No.: OHD 046 630 679 SWB - AIS
Request for Change in Status to: U.S. EPA, REGION V
"Generator Accumulating Waste On-Site
in Compliance with 40 CFR 262.34"

Dear Ms. Ardiente:

Pursuant to your letters of July 23, 1985 and of July 30, 1985 regarding our request to withdraw our Part A Hazardous Waste Permit Application, I have enclosed completed copies of a Request for Change in Status and a Certification Regarding Potential Releases from Solid Waste Management Units as you requested. I believe this information is sufficient to eliminate the need for a RCRA permit at this facility.

If additional information is required, please call me at (216) 798-2861.

Very truly yours,

DiversiTech General, Inc.


Ronald W. Frase, Manager
Environmental Engineering

RWF:sms:8

Attachments

cc: H. B. Thompson
W. Benkowski - Newcomerstown

COPY 2

One General Street Akron, Ohio 44329 (216) 798-0132



A GENCORP COMPANY

04 D046630679

April 19, 1985

APR 25 1985
RECEIVED RECEIVED

MAY 14 1985

SWB-AIS
U.S. EPA, REGION V

APR 24 1985
EPA REGION 5
OFFICE OF REGIONAL
ADMINISTRATION

Mr. Valdas V. Adamkus, Administrator
U.S. Environmental Protection Agency
Region V
Federal Building
230 South Dearborn Street
Chicago, Illinois 60604

Subject: DiversiTech General, Inc.
Corporate Name Change

Dear Mr. Adamkus:

During 1984 GenCorp, Inc. (formerly The General Tire and Rubber Company) became a holding company. At the end of the fiscal year the major divisions of GenCorp were split off as wholly-owned subsidiaries and corporations in their own right. One of these corporations is DiversiTech General, Inc. Many of the assets of GenCorp dropped down to become the property of DiversiTech General.

I am writing to you on behalf of DiversiTech requesting that your agency change our name on existing permits and in appropriate files to reflect this new ownership. Facilities within your jurisdiction which formerly belonged to GenCorp, but which now belong to DiversiTech General, Inc., are listed on the attachment showing both previous and new names. The addresses of these facilities remain the same.

Please send me confirmation of the requested name changes. If there are any questions regarding this matter, please phone me at (216) 798-2861.

Very truly yours,

Ronald W. Frase
Ronald W. Frase, Manager
Environmental Engineering

xd 0194g
Attachment

cc: Region V

David Kee, Director, Air Management Division
Charles Sutfin, Director, Water Management Division
William Constantelos, Director, Waste Management Division

O: Kee - AMD
cc: WATER
WMD
RF
RA

Former Name	New Name
The General Tire and Rubber Company Middle Road P. O. Box 68 Ashtabula, Ohio 44004 Federal ID OHD 004162343	DiversiTech General, Inc. Ashtabula Plant
The General Tire and Rubber Company Evansville Plant 605 W. Eichel Street Evansville, Indiana 47710 Federal ID IND 006371322	DiversiTech General, Inc. Evansville Plant
The General Tire and Rubber Company Ionia Plant 119 S. Dexter Street P. O. Box 510 Ionia, Michigan 48846 Federal ID MID 053669040	DiversiTech General, Inc. Ionia Plant
The General Tire and Rubber Company Logansport Plant One General Street Logansport, Indiana 46947 Federal ID IND 005106984	DiversiTech General, Inc. Logansport Plant
The General Tire and Rubber Company Marion Plant 1700 Factory Avenue Marion, Indiana Federal ID IND 006418271	DiversiTech General, Inc. Marion Plant
The General Tire and Rubber Company Mogadore Chemical Plant 165 South Cleveland Avenue Mogadore, Ohio 44260 Federal ID OHD 085763555	DiversiTech General, Inc. Mogadore Plant
The General Tire and Rubber Company Mogadore Pilot Plant 165 South Cleveland Avenue Mogadore, Ohio 44260 Federal ID OHD 980795348	DiversiTech General, Inc. Mogadore Pilot Plant
The General Tire and Rubber Company Newcomerstown Plant Pilling Street Newcomerstown, Ohio 43832 Federal ID OHD 046630679	DiversiTech General, Inc. Newcomerstown Plant

**CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS**

FACILITY NAME: DiversiTech General, Inc., Newcomerstown Plant

EPA I.D. NUMBER: OHDO 466 306 79

LOCATION CITY: Newcomerstown

STATE: OHIO

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART B APPLICATION

	<u>YES</u>	<u>NO</u>
• Landfill	<u> </u>	<u>X</u>
• Surface Impoundment	<u> </u>	<u>X</u>
• Land Farm	<u> </u>	<u>X</u>
• Waste Pile	<u> </u>	<u>X</u>
• Incinerator	<u> </u>	<u>X</u>
• Storage Tank (Above Ground)	<u>X</u>	<u> </u>
• Storage Tank (Underground)	<u>X</u>	<u> </u>
• Container Storage Area	<u>X</u>	<u> </u>
• Injection Wells	<u> </u>	<u>X</u>
• Wastewater Treatment Units	<u> </u>	<u>X</u>
• Transfer Stations	<u>X</u>	<u> </u>
• Waste Recycling Operations	<u> </u>	<u>X</u>
• Waste Treatment, Detoxification	<u> </u>	<u>X</u>
• Other <u> </u>	<u> </u>	<u>X</u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed on and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

SEE ATTACHED

NOTE: Hazardous waste are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part B application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

NONE

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

NONE

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Harry B. Thompson
Vice President, Manufacturing Services

Typed Name and Title

Harry B. Thompson
Signature

August 21, 1985
Date



Re: Hazardous Waste Activity Status
U.S. EPA I.D. No. OHD046630679 *G, TSD, PA-9*
Ohio Permit No. 04-79-0428

April 1, 1985

H.J. Kalbas
President
GTR Plastic Film Co.
One General St.
Newcomerstown, Ohio 43832

Dear H.J. Kalbas:

According to our records, your Ohio Hazardous Waste Installation & Operation Permit has expired. Prior to the expiration of that permit, you had informed and certified to the Ohio EPA that you no longer conducted hazardous waste activity for which a permit was required.

Therefore, this letter is to inform you that, based on the information you had submitted and an investigation by Agency staff, you will maintain the status of a generator only with less than 90 day storage.

You should continue to use the identification number assigned to you by the U.S. EPA for purposes of compliance with the Ohio EPA manifest, recordkeeping and reporting requirements for generators and transporters of hazardous waste as appropriate.

Should you have any questions concerning your current status, please contact the appropriate Ohio EPA District Office (see enclosed list).

Very truly yours,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Solid and Hazardous Waste Management

TEC/ds

Enclosure

cc: U.S. EPA, Region V
HWFB
D.O.

FORM 1 GENERAL		ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER F O H D 0 4 6 6 3 0 6 7 9 1 2 13 14 15																			
II. POLLUTANT CHARACTERISTICS				GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.																			
III. NAME OF FACILITY				IV. FACILITY CONTACT																			
V. FACILITY MAILING ADDRESS				VI. FACILITY LOCATION																			
EPA I.D. NUMBER				PLEASE PLACE LABEL IN THIS SPACE																			
III. FACILITY NAME																							
V. FACILITY MAILING ADDRESS																							
VI. FACILITY LOCATION																							
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.																							
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)				MARK 'X' YES NO FORM ATTACHED			B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)				MARK 'X' YES NO FORM ATTACHED												
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)				X NA			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)				X NA												
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)				X NA			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)				X NA												
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)				X NA			H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)				X NA												
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)				X NA			J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)				X NA												
IV. FACILITY CONTACT				V. FACILITY MAILING ADDRESS																			
A. NAME & TITLE (last, first, & title)				B. PHONE (area code & no.)																			
FRASE, RONALD MGR ENVIRONL ENGR				216 798 2861																			
V. FACILITY MAILING ADDRESS				VI. FACILITY LOCATION																			
A. STREET OR P.O. BOX				B. CITY OR TOWN												C. STATE		D. ZIP CODE					
ONE GENERAL STREET				NEWCOMERSTOWN												OH		43832					
VI. FACILITY LOCATION				VII. COUNTY INFORMATION																			
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER				B. COUNTY NAME												C. CITY OR TOWN		D. STATE		E. ZIP CODE		F. COUNTY CODE (if known)	
US 36 AND SR 208				TUSCARAWAS												NEWCOMERSTOWN		OH		43832			

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
C	7	3	0	C	7		
15	16	17	18	15	16	17	18
(specify) MISCELLANEOUS PLASTIC PRODUCTS				(specify)			
C. THIRD				D. FOURTH			
C	7			C	7		
15	16	17	18	15	16	17	18
(specify)				(specify)			

VIII. OPERATOR INFORMATION

A. NAME															B. Is the name listed in Item VIII-A also the owner?									
C	8	D	I	V	E	R	S	I	T	E	C	H	G	E	N	E	R	A	L	I	N	C	.	
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36			
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																	D. PHONE (area code & no.)							
F = FEDERAL S = STATE P = PRIVATE M = PUBLIC (other than federal or state) O = OTHER (specify)																	A 2 1 6 7 9 8 3 0 0 0							
E. STREET OR P.O. BOX																								
ONE GENERAL STREET																								
F. CITY OR TOWN																	G. STATE		H. ZIP CODE			IX. INDIAN LAND		
AKRON																	OH		4 4 3 2 9			Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36																	40 41 42		47 48 49 50 51			52		

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)																
C	9	N	O	H	0	0	0	4	4	3	0	C	9	P	N	A										
15	16	17	18	19	20	21	22	23	24	25	26	15	16	17	18	19	20	21	22							
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)																
C	9	U	N	A						C	9	A	I	R	P	E	R	M	I	T	S					
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24	25						
C. RCRA (Hazardous Wastes)										E. OTHER (specify)																
C	9	R	O	H	D	0	4	6	6	3	0	6	7	9	C	9	0	4	-	7	9	-	0	4	2	8
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	15	16	17	18	19	20	21	22	23	24	25	
(specify)										(specify)																
Ohio State Hazardous Waste Facility Permit																										

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Manufacture of thermoplastic film and sheet using calenders and laminating presses.

XIII. CERTIFICATION (see Instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE	C. DATE SIGNED
Harry B. Thompson Vice President, Manufacturing Services		Harry B. Thompson	7/18/85

COMMENTS FOR OFFICIAL USE ONLY

C	
15	16

OHIO STATE AIR POLLUTION PERMITS

NEWCOMERSTOWN PLANT

<u>Permit Number</u>	<u>Source Description</u>	<u>Expiration Date</u>
0679000004 - P001	No. 1, 2, 3, 4 and 10 Extruders	Registered
- P002	No. 7, 8 and 11 Extruders	"
- P003	No. 5 Extruder	"
- P004	No. 6 Extruder	"
- P005	No. 9 Extruder	"
- P006	No. 1 Bag Unload and BB Mix	"
- P007	No. 1 Calender	"
- P008	No. 2 Bag Unload and Banbury Mixer	"
- P009	No. 2 Calender	"
- P0010	No. 3 Bag Unload and Banbury Mixer	"
- P0011	No. 3 Calender	"
- P0012	Savage Saw	"
- P0013	Silos 109	"
- P0014	No. 4 Bag Unload and Banbury Mixer	"
- P0015	No. 4 Calender	"
- P0016	Compounding Room	"

THE GENERAL TIRE & RUBBER COMPANY

AKRON, OHIO 44329

GROUP VICE PRESIDENT
Phone (216) 798-3400

February 8, 1983

Mr. Charles Slaustas
Waste Management Branch
U.S. Environmental Protection Agency
230 S. Dearborn
Chicago, Illinois 60604

Re: The General Tire & Rubber Company
Newcomerstown, Ohio

Dear Mr. Slaustas:

It is my understanding that in order to complete your files you have requested Mr. A. Maupin of our Newcomerstown plant send you a copy of my original letter of August 23, 1982 in which the Newcomerstown plant requested status as a generator only.

Attached is a machine duplicate of our file copy, which I have also signed.

Sincerely,


S. Salem

xd
Enclosure

RECEIVED
FEB 11 1983
WASTE MANAGEMENT
BRANCH

7

THE GENERAL TIRE & RUBBER COMPANY

AKRON, OHIO 44329

GROUP VICE PRESIDENT
Phone (216) 798-3400

August 23, 1982

G, TSO, PA

RCRA Activities
Part B Permit Application
USEPA Region V
P. O. Box A3587
Chicago, Illinois 60690-3587

Attention: Mr. Y. J. Kim
5AHWM

RECEIVED

AUG 26 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

Dear Mr. Kim:

During our preparation of our Part B application, we have evaluated our hazardous waste operations and have decided to become only a generator and discontinue our storage operation. Therefore, we are withdrawing our Part A application (ID No. OHD 046630679). The Part A application was both to treat and store hazardous wastes. This letter is in lieu of our Part B application due 8/18/82.

Closure of these interim status activities will be done by going on a 85 day cycle of pick up of liquid wastes. Pick up of solid wastes is already on a 45 to 60 day cycle. The treatment operation that we applied for has not been used since 1980 and was discontinued for economic reasons. Treatment consisted of encapsulating solid hazardous waste into waste resin using the same high intensity mixer and two roll mill used in production. This process was essentially closed as soon as the equipment was cleaned to resume normal production.

I certify under penalty of law that I have personally examined and am familiar with this letter and that based on my inquiry of these persons immediately responsible for obtaining the information contained in this letter, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Sincerely,

S. Salem
S. Salem

SS:raj

RWK
8/23/82

RECEIVED
8/24/82



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Mr. Arthur Maupin
GTR Plastics Film Co.
One General Street
Newcomerstown, Ohio 43832

RE: OHDO46630679
GTR Plastics Film Co.
US 36 & SR 208
Newcomerstown, Ohio

Dear Mr. Maupin:

To facilitate the processing of hazardous waste permit applications, we are making two additional requirements concerning the format of these applications:

1. Please uniquely number each page of the application including all attachments (maps, specifications, etc.)
2. If you claim parts of your application as confidential, please provide us with a public information copy of the application. The public information copy must be identical to the full application with the exclusion of the confidential information.

If you have any questions, please call the person indicated in the Part B request letter. Thank you for your cooperation.

Sincerely yours,


Karl J. Klepitsch, Jr., Chief
Waste Management Branch

FILE



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW-TUB

MAY 20 1982

Mr. Arthur Maupin
GTR Plastic Film Co.
One General Street
New Comerstown, Ohio 43832

RE: EPA ID# OHD046630679
GTR Plastics Film Co.
Newcomerstown, Ohio 43832

Dear Mr. Maupin:

Recently, we requested you to submit a Part B application for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act, as amended (RCRA) permit program.

In an attempt to coordinate the review of your application with the Ohio Environmental Protection Agency (OEPA), and striving for a simultaneous issuance or denial of Federal and State hazardous waste facility permits, we urge you to submit three copies of your Part B to OEPA at the same time it is submitted to this Agency. The mailing address for OEPA is:

Ohio Environmental Protection Agency
Division of Hazardous Materials Management
361 East Broad Street Box 1049
Columbus, Ohio 43216

Your direct submittal is necessary to allow OEPA to begin processing under Ohio state law. If you send copies directly to OEPA, you need send only three (rather than four) copies to USEPA.

If you have questions concerning the Ohio permitting process, please contact Mr. Paul Flanigan of OEPA at (614) 462-6303, or Mr. Bob Fragale of the Ohio Hazardous Waste Facility Approval Board at (614) 462-6981. If you have questions concerning the Federal permit process, please contact your permit-writer in this Agency, or Ms. Kathleen Homer, State Implementation Officer for Ohio, at (312) 886-6148.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Paul Flanigan - OEPA
Bob Fragale - HWFAB



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

FEB 11 1982

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

Mr. Arthur Maupin
Senior Project Engineer
GTR Plastic Film Company
One General Street
Newcomerstown, Ohio 43832

RE: Interim Status Acknowledgement USEPA ID No. OHD046630679
FACILITY NAME: GTR Plastic Film Company

Dear Mr. Maupin:


This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,


Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

PA ID NUMBER

0HD046630679

GTR PLASTIC FILM CO

THE GENERAL TIRE & RUBBER CO

ONE GENERAL STREET
NEWCOMERTOWN

OH 43832

DESIGN CAPACITY

UNIT OF MEASURE

S01
T04

15600.00000
5500.00000

GU

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE	UNIT OF MEASURE	CODE
STORAGE:				
CONTAINER	S01	G or L	GALLONS	G
TANK	S02	G or L	LITERS	L
WASTE PILE	S03	Y or C	CUBIC YARDS	Y
SURFACE IMPOUNDMENT	S04	G or L	CUBIC METERS	C
DISPOSAL:			GALLONS PER DAY	U
			LITERS PER DAY	V
			TONS PER HOUR	D
			METRIC TONS/HOUR	W
INJECTION WELL	D79	G, L, U, or V	GALLONS/HOUR	E
LANDFILL	D80	A or F	LITERS/HOUR	H
LAND APPLICATION	D81	B or Q	ACRE-Feet	A
OCEAN DISPOSAL	D82	U or V	HECTARE-METER	F
SURFACE IMPOUNDMENT	D83	G or L	ACRES	B
TREATMENT:			HECTARES	Q
			POUNDS/HOUR	J
TANK	T01	U or V	KILOGRAMS/HOUR	R
SURFACE IMPOUNDMENT	T02	U or V	TONS PER DAY	N
INCINERATOR	T03	D, W, E, or H	METRIC TONS/DAY	S
OTHER	T04	U, V, J, R, N, or S		

FEB 11 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Arthur Maupin
Senior Project Engineer
GTR Plastic Film Company
One General Street
New Comerstown, Ohio 43832

SAMM

P23-6 855902

Uman
out P. Sluiter
3/8/83

nu P7 A

RE: GTR Plastic Film Company
US 36 and SR 208
New Comerstown, Ohio 43832
OND046630679

Dear Mr. Maupin:

By now you should have received an acknowledgement of our receipt of your Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation & Recovery Act, as amended (RCRA) permit program. You should also have been apprised of your condition relative to interim status.

Accordingly, this letter constitutes the next step in the formal process leading to issuance or denial of an RCRA permit. Under the authority of 40 CFR 122.22, this is a formal request for submittal of Part B of your application for the above-referenced facility.

Enclosed is a copy of 40 CFR 122.25 which lists the items that constitute Part B for your facility. Your Part B application must be submitted in quadruplicate and postmarked no later than August 18, 1982. Please send your application to the following address:

RCRA ACTIVITIES
Part B Permit Application
USEPA, Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

While your complete application is due no later than the above date, you are encouraged to submit at your earliest opportunity those components which have been completed. Several interim status documents also are used as components of your Part B application. Included are such items as your waste analysis plan, contingency plan, closure plan, etc., each of which may be submitted to this office immediately, to initiate the processing of your Part B application.

Failure to furnish your complete Part B application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR 122.22.

Information you submit in the Part B application can be disclosed to the public, according to the Freedom of Information Act and U.S. Environmental Protection Agency (USEPA) Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. USEPA will review business confidentiality claims under regulations at 40 CFR Part 2, and will later request substantiation of any claims. Please review these rules carefully before making a claim.

We have also enclosed a copy of 40 CFR Part 264 which includes technical standards for the operation of treatment and storage facilities. These standards will become applicable upon issuance of a permit to your facility by USEPA.

We will coordinate review of your application with the Ohio Environmental Protection Agency and the Hazardous Waste facility Approval Board, and if your application is acceptable, will strive for a simultaneous issuance of Federal and State hazardous waste facility permits. It is possible that during the processing of your application, the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case, direct Federal processing will cease, and the State in lieu of USEPA will make the final determination on your application.

We are committed to conducting the RCRA permitting process as efficiently as possible. Consequently I suggest you contact Mr. Y.J. Kim of my staff at (312) 886-7425, as you begin preparing your application. Mr. Kim will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

We look forward to receiving your Part B application.

Sincerely yours,

Original signed by
Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures: 40 CFR 122.25
40 CFR 264

cc: S. Salem, Vice President
Robert W. Laundrie
Paul Flanigan, OEPA
Peggy Vince, HWFAB

bcc: Part A File
Y.J. Kim

Y.J. Kim:O.Robinson:5AHWM:WMB:PEU:2/11/82

OH D046630679

[Handwritten signature]
2/11/82

STU2
D. Banaszk
2-12-82

[Handwritten note]
D02/12/82



04D046630679^{OK}

GTR PLASTIC FILM COMPANY

ONE GENERAL STREET • NEWCOMERSTOWN, OHIO 43832

PHONE: (614) 498-5900

February 20, 1981

EPA REGION V
RCRA Activities
P.O. BOX 7861
Chicago, Illinois 60680

Attn: Sharon Boone

Dear Ms. Boone:

When we sent in our RCRA application we mistakenly sent one both from our plant and from our division headquarters.

Please disregard the form with I.D. #OHD000817403 which was sent in without division review.

If you have any questions, please call.

Sincerely,

A.N. Maupin

04D046630679

*Taken
care of
File up*

ANM/be

cc: C. MacDonald
W. Russell
R. Laundrie

Sub/notification

FEB 20 1981

FORM 1
GENERAL

EPA

ENVIRONMENTAL PROTECTION AGENCY
GENERAL INFORMATION
Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F O H D 0 4 6 6 3 0 6 7 9 3 D

II. POLLUTANT CHARACTERISTICS

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

OHD046630679

GENERAL TIRE & RUBBER CO*
RTE 36 & 16
NEWCOMERSTOWN, OH 43832

RTE 36 & 16
NEWCOMERSTOWN, OH 43832

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP GTR PLASTIC FILM CO.

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)

2 MAUPIN ARTHUR SR. PROJECT ENG.

B. PHONE (area code & no.)

614 498 5900

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 ONE GENERAL STREET

B. CITY OR TOWN

4 NEWCOMERSTOWN

C. STATE

OH

D. ZIP CODE

43832

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 US 36 AND SR 208

B. COUNTY NAME

TUSCARAWAS

C. CITY OR TOWN

6 NEWCOMERSTOWN

D. STATE

OH

E. ZIP CODE

43832

F. COUNTY CODE (if known)

157

NOV 14 1980

VIII. OPERATOR INFORMATION

F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND	
NEWCOMERTOWN										OH		43832		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
15	16	40						41	42	47	-	51	52		

X. EXISTING ENVIRONMENTAL PERMITS																	
A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)							
C	T	I								C	T	I					
9	N		0	H	0	0	0	4	3	0	9	P					
15	16	17	18				30	15	16	17	18				30		
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)							
C	T	I								C	T	I				(specify)	
9	U									9						See Attachment A	
15	16	17	18				30	15	16	17	18				30		
C. RCRA (Hazardous Wastes)										E. OTHER (specify)							
C	T	I								C	T	I				(specify)	
9	R									9							
15	16	17	18				30	15	16	17	18				30		

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

Manufacture of thermoplastic film and sheet using calenders, extruders and laminating presses.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE <i>(type or print)</i> S. Salem - VicePresident	B. SIGNATURE 	C. DATE SIGNED 11/11/80
--	---	-----------------------------------

[illegible]

X A



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

OHD046630679

REACKNOWLEDGEMENT

GTR PLASTIC FILM CO
ONE GENERAL STREET
NEWCOMERSTOWN

OH 43832

INSTALLATION ADDRESS

ONE GENERAL STREET
NEWCOMERSTOWN

OH 43832

CONTINUE ON REVERSE

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

T04 - This process consists of encapsulating waste solids into resin so that the extraction rate is reduced enough to allow disposal in a conventional sanitary landfill. Present equipment used for this is a banbury mixer and a two roll mill.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS. P
TONS. T

METRIC UNIT OF MEASURE CODE
KILOGRAMS. K
METRIC TONS. M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
S W 0 H D 0 4 6 6 3 0 6 7 9 3 1													S W DUP 3 2 DUP												
DESCRIPTION OF HAZARDOUS WASTES (continued)																									
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																					
				1. PROCESS CODES (enter)																					
				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																					
1	D 0 0 6	40,000 000	P	S 0 1	Waste liquid stabilizer																				
2	D 0 0 8	Included with above																							
3	D 0 0 6	600,000 000	P	S 0 1 T 0 4	Waste solid stabilizer, scrap materials																				
4	D 0 0 8	Included with above																							
5																									
6																									
7																									
8																									
9																									
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25																									
26																									

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F O H D 0 4 6 6 3 0 6 7 9 3 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

F6: A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

F6: B/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4 0 1 6 4 4 0

LONGITUDE (degrees, minutes, & seconds)

0 8 1 3 5 2 3 0

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

The General Tire & Rubber Company

2 1 6 - 7 9 8 - 3 0 0 0

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

One General Street

Akron

O H

4 4 3 2 9

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

S. Salem - Vice President

S. Salem

11/11/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

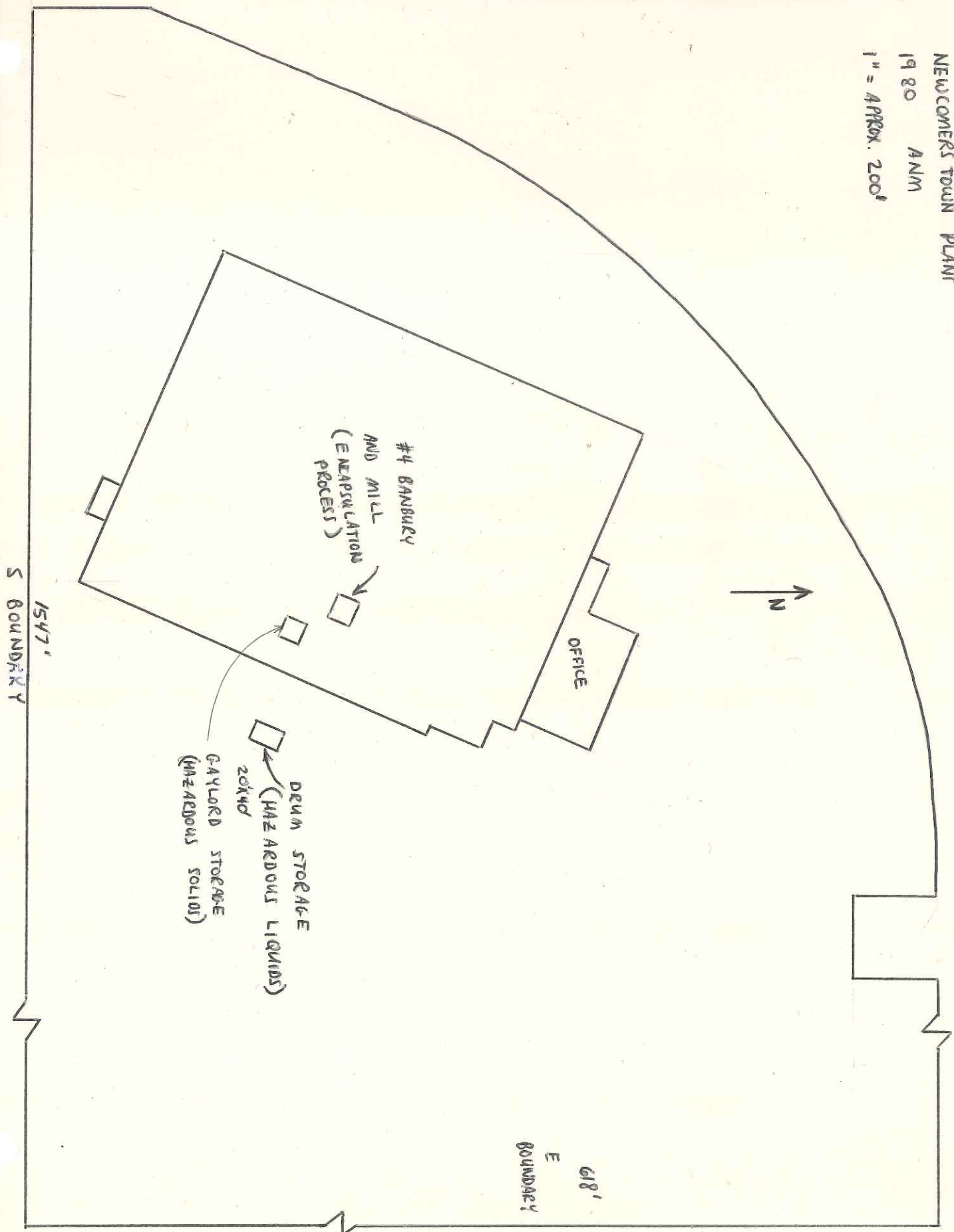
Robert W. Laundrie

ROBERT W. LAUNDRIE

11/4/80

V. FACILITY DRAWING (see page 4)

FACILITY DRAWING
 NEWCOMERS TOWN PLANT
 1980 ANN
 1" = APPROX. 200'



OHIO AIR POLLUTION OPERATING PERMITS

<u>Company ID</u>	<u>Number *</u>
Extruders No. 1, 2, 3, 4, and 10	0679000004 P001
Extruders No. 7, 8 and 11	0679000004 P002
Extruders No. 5	0679000004 P003
Extruder No. 6	0679000004 P004
Extruder No. 9	0679000004 P005
#1 Bag Unload and Banbury Mix	0679000004 P006
#1 Calendering	0679000004 P007
#2 Bag Unload and Banbury Mix	0679000004 P008
#2 Calendering	0679000004 P009
#3 Bag Unloading and Continuous Mix	0679000004 P010
#3 Calendering	0679000004 P011
Savage Saw	0679000004 P012
Silos 1 through 9	0679000004 P013

* No expiration date. Registration status.





INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

INSTALLATION'S EPA I.D. NO.	OHIO046630679
NAME OF INSTALLATION	GENERAL TIRE & RUBBER CO.
II. INSTALLATION MAILING ADDRESS	RTE 36 & 16 NEWCOMERSTOWN, OH 43832 0010
III. LOCATION OF INSTALLATION	RTE 36 & 16 NEWCOMERSTOWN, OH 43832

001043 AUG 19 80

COMMENTS

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STREET OR P.O. BOX

[illegible]

CITY OR TOWN

[illegible]

STREET OR ROUTE NUMBER

[illegible]

CITY OR TOWN _____

[illegible]

NAME AND TITLE (last, first, & job title)

2	M	A	U	P	I	N		A	R	T	H	U	R		S	R		P	R	O	J	E	C	T		E	N	G			6	1	4		4	9	8	
15	16																														45	46	-	48		49	-	51

A. NAME OF INSTALLATION'S LEGAL OWNER

[illegible]

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION

☒ C. TREAT/STORE/DISPOSE

☐ **B. TRANSPORTATION** (complete item VII)
58

☐ **D. UNDERGROUND INJECTION**

VII. MODE OF TRANSPORTATION (transporters only – enter “X” in the appropriate box(es))

☐ **A. AIR** ☐ **B. RAIL** ☐ **C. HIGHWAY** ☐ **D. WATER** ☐ **E. OTHER (specify):**

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION

☐ **B. SUBSEQUENT NOTIFICATION** (complete item C)

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

C. INSTALLATION'S EPA I.D. NO.

0	H	D	0	4	6	6	3	0	6	7	9
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I.D. - FOR OFFICIAL USE ONLY														
S												T/A	C	
W	0	H	D	0	4	6	6	8	0	6	7	9	2	1
1	2										13	14	15	

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F001 23 - 26	2 23 - 26	3 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U013 23 - 26	32 23 - 26	33 23 - 26	34 23 - 26	35 23 - 26	36 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

Robert W. Landrie

NAME & OFFICIAL TITLE (type or print)

Robert W. Landrie, Manager
Ecology, Safety, & Health Engineering
Chemical/Plastics/Industrial Products

DATE SIGNED

8/15/80

EPA Form 8700-12 (6-80) REVERSE

0	1	2	3	4	5	6	7	8	9
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INSTALLATION'S EPA I.D. NO.

DATE OF FIRST NOTIFICATION

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

CONTINUE ON REVERSE

AUG 18 1980

EPA Form 8700-12 (6-80)

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.

NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

~~Deleted - filed under~~~~OH0046630679~~

DHD046630679

GENERAL TIRE & RUBBER CO.
RTE 36 & 16
NEWCOMERSTOWN, OH 43832

000197 AUG 15 80

RTE 36 & 16
NEWCOMERSTOWN, OH 43832

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)~~OH00000817403~~T/A
21

A

800818

I. NAME OF INSTALLATION

G T R P L A S T I C F I L M C O

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 ONE GENERAL STREET

CITY OR TOWN

ST.

ZIP CODE

4

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 ONE GENERAL STREET

CITY OR TOWN

ST.

ZIP CODE

6

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

2 MAUPIN ARTHUR SR PROJECT ENG

614-498-5900

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 GENERAL TIRE AND RUBBER CO

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

~~OH00000817403~~

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 14

AUG 14 1980

W	0	1	1	0	0	0	0	8	1	7	4	0	3	2	1
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1 23 - 26	2 23 - 26	3 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 23 - 26	32 23 - 26	33 23 - 26	34 23 - 26	35 23 - 26	36 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
---------------	---------------	---------------	---------------	---------------	---------------

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)
X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE



NAME & OFFICIAL TITLE (type or print)

K. Chaloupek
Plant Manager

DATE SIGNED

8/11/80

**C.2 Compliance/
Enforcement**

014 D 0466 30'679

5HR-12

Mr. Steve Hamlin
Ohio Environmental Protection Agency
Southeast District Office
2195 Front Street
Logan, Ohio 43138

Dear Mr. Hamlin:

On July 28, 1988, the United States Environmental Protection Agency
(U.S. EPA) conducted oversight inspections at Simonds Cutting Tool and
Diversitech General. Enclosed are copies of the Oversight Inspection
Forms. If you have any questions concerning these inspections, please
contact Sally Averill of my staff at (312) 886-4439.

Sincerely yours,

ORIGINAL SIGNED BY

JAMES BROSSMAN

James Brossman, Chief
OH/MN Technical Enforcement Section

Enclosure

5HR-12:SAVERILL:sbowie:6-4439:9/13/88



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138-9031
(614) 385-8501

RECEIVED
AUG 10 1988

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Richard F. Celeste
Governor

August 8, 1988

TUSCARAWAS COUNTY
DIVERSITECH GENERAL
RCRA CORRESPONDENCE
OHD046630679
G

Diversitech General
Plastic Film Division
One General Street
Newcomerstown, Ohio 43832

Attention: William Sterrett,
Manager, Plant Engineering

Dear Sir:

On July 28, 1988, Ohio EPA conducted an inspection of your facility to determine compliance with hazardous waste regulations. Representatives of USEPA were also present during the inspection. The following violations were noted:

1. Waste Evaluation, Ohio Administrative Code 3745-52-11 (40 CFR 262.11): Waste evaluation data was not available for the waste stabilizer, spent aluminum oxide, or Safety Kleen solvent. Evaluations of these wastes must be completed, and the results submitted to this office, within 30 days. Note that if the Safety Kleen solvent is hazardous waste, a manifest will be required for shipment of this material.
2. Manifest - General Requirements, Ohio Administrative Code 3745-52-20 (40 CFR 262.20): Completed manifests contained 3-digit document numbers rather than the required 5-digit number. Future manifests must contain 5-digit document numbers.
3. Personnel Training, Ohio Administrative Code 3745-65-16 (40 CFR 265.16): Annual training had not been conducted for waste management and emergency procedures. Training must be completed within 30 days, and training records which include employee job titles and job descriptions must be maintained.

Diversitech General
August 8, 1988
Page Two

4. Content of Contingency Plan, Ohio Administrative Code 3745-65-52 40 CFR 265.52): The hazardous waste contingency plan lacks certain components necessary to comply with this rule.

Improvements are required in the following areas:

- a. The plan must include procedures to be implemented in the event of a fire, including management of contaminated water run-off.
- b. The plan must include soil sampling after cleanup of an outside spill to insure adequacy of contaminant removal.
- c. The addresses and phone numbers of emergency coordinators must be included. Do the listed persons have the authority to implement the necessary procedures to address a fire or spill?
- d. The equipment list must be expanded to include location and description for fire and spill control equipment.
- e. The Ohio EPA 24-hour emergency response number is 800-282-9378.

The contingency plan must be revised and submitted to this office and local emergency service authorities within 30 days.

5. Management of Containers, Ohio Administrative Code 3745-66-73 40 CFR 265.173): Solids containers (including the rolloff container) located outside the building were observed open and unattended. Containers must be stored closed except when waste is being added or removed.

Diversitech General
August 8, 1988
Page Three

A copy of the inspection form is enclosed. The above violations must be corrected, and documentation of the corrections submitted to this office within 30 days of receipt of this letter. If you have any questions, please contact me at this office.

Sincerely,



Brian J. Blair
District Representative
Division of Solid & Hazardous Waste Management

BJB:dm

cc: Dave Sholtis, DSHWM, CO
cc: Walter Neid, USEPA, Region V

7/28/88

Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB #

D046630679

U.S. EPA I.D. # 011 Newcomerstown

GENERAL INFORMATION

Facility: Diversitech General

Address: One General Street

43832

County: Tuscarawas

Telephone: 614-498-5900

State: Ohio Zip Code:

City: Newcomerstown

INSPECTION PARTICIPANT(S)

(Title)

(Telephone)

(Name)

Plant Engineer

498-5900

1. William Sterrett

Technical Director

498-5900

2. Joel Kastor

INSPECTOR(S)

614-385-8501

Ohio EPA

1. Brian Blair

USEPA, Region V

312-386-0992

2. Walter Neid

USEPA, Region V

312-386-1498

3. Salley Averill

INSTALLATION ACTIVITY

If the site is a TSDF, check the boxes indicating which areas were reviewed.

Mark One

☒ Generator only (G)

☐ General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure

☐ Waste Piles S03

☐ Transporter (T)

☐ Land Treatment D81

☐ TSDF only

☐ Containers S01

☐ Landfills D80

☐ G-T

☐ Tanks S02/T01

☐ Chemical/Physical/Biological T04

☐ G-TSDF

☐ Surface Impoundments S04/T02

☐ Groundwater Monitoring

☐ T-TSDF

☐ Incineration/Thermal Treatment

☐ Post-Closure

☐ G-T-TSDF

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?

2. If "yes", is it complete and accurate?

3. Has the facility submitted a Part B?

4. Was advance notice of the inspection given? If so, how far in advance?

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

Diversitech manufactures plastic sheet. PVC, stabilizers and additives are used as raw materials. Certain additives contain E. P. Toxic metals. E. P. Toxic waste solids and liquids are accumulated in containers and manifested offsite. A large rolloff container is used to collect solid material. A Safety-Kleen solvent unit is also used in the machine shop.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>
<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>
<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>
<u>X</u>	<u>—</u>	<u>—</u>	<u>1 day</u>

Revised 12/84

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	—	X	—	#1
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	X	—	—	#2
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	—	X	—	—
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	—	X	—	#3
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	X	—	—	—
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	X	—	—	—
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	X	—	—	—
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	X	—	—	—

Revised 12/84

Yes	No	N/A	Remark
X			
X			
X			
		X	
X			
X			
	X		#4
	X		#4

Revised 12/84

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

- #1 Waste evaluation data was not available for the waste stabilizer liquid, the aluminum oxide waste, or the Safety Kleen solvent.
- #2 Some solids are reused in the process.
- #3 Manifests did not contain 5-digit document numbers (3-digit numbers were used).
- #4 Although a training procedure has been developed to meet RCRA requirements, the required annual training is overdue.

Revised 12/84

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark

9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]

- a) Protection from sources of ignition. X
- b) Physical separation of incompatible waste materials. X
- c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled. X
- d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)] X

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31] X

2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)] X

- a) Internal alarm system. X
 - b) Access to telephone, radio or other device for summoning emergency assistance. X
 - c) Portable fire control equipment. X
 - d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers. X
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33] X
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34] X

Revised 12/84

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]	X			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]	X			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]			X	
Subpart D: Contingency and Emergency				
1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:		X		#5
a) Actions to be taken by personnel in the event of an emergency incident.		X		#5
b) Arrangements or agreements with local or state emergency authorities.		X		#5
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.		X		#5
d) A list of all emergency equipment including location, physical description and outline of capabilities.		X		#5
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]			X	
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]		X		#6

#5 The contingency plan does not address fire emergencies or agreements with emergency authorities. The address and phone numbers of emergency coordinators are not included. Equipment lists do not include location or description.

#6 Plan is in process of revision. Emergency authorities do not yet have a copy of the new plan. Revised 12/84

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

1. Hazardous wastes are stored in containers which are:

a) Closed (265.173) [3745-66-73(A)]

b) In good physical condition (265.171) [3745-66-71]

c) Compatible with the wastes stored in them (265.172) [3745-66-72]

2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]

3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]

4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]

5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]

6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]

#7 The outdoor rolloff container, and solids drums next to the rolloff, were observed open and unattended.

Revised 12/84

Oversight Inspection Form

Oversight Inspection Form

Instructions:

The form is divided into two parts. Part 1 is used during the actual inspection to record observations made in the field. Part 2 of the form is used to evaluate the State inspection report relative to field observations. Both parts of the oversight inspection report have to be completed by the EPA oversight inspector. In the remarks column, N/A may be appropriate in some instances.

PART 1

I. Facility Name: Diversitech General / Gencorp Polymer Product ^{Permitted as Business}

EPA ID #: OHDO 466 306 79

Facility Activities: Small Quantity Generator

X Generator 9 tons per hopper / 1 a month ^{20 yd}

Transporter 3 barrels - 5 1/2 month

Treatment/Storage/Disposal Facility

^{safetyclean}
solvents - cleaning
caustic solutions
? ^{degreasers - safetyclean}
Acid

II. Inspection Type: X CEI

O & M

CME

Lab Audit

Records Review

Compliance Monitoring

CDI

Other (specify) _____

Items To Be Reviewed: X Full Scope

Limited Scope

Inspection Format: Joint

Independent

III. EPA Oversight Inspector: Sally Ann Averill

Organization: USEPA

Telephone: (312) 886-4439

IV. Inspection Date(s): 7/28/88

vc plastic, sheet form. waste - Pb stabilizers, Barium, Cadmium stabilizers.

Oversight Inspection Form

Yes No Remarks

V. Pre-Inspection Review

1. Did the State inspector
arrange the logistics of the
inspection by assuring:
a. facility actively operating?
b. EPA properly notified?

X
X

2. Did the State transmit requested
documents according to the
established schedule?

N/A

3. Was the inspector prepared
to conduct the inspection?
The inspector should have
pertinent information (permit
application, previous inspection
reports, waste types handled)
and equipment (safety and
sampling)?

X

4. Did the inspector present the
appropriate identification and
advise the owner/operator of the
purpose of the inspection and
briefly describe the agenda?

X

VI. Facility Information (Observations)

1. Did the inspector demonstrate
or obtain knowledge of the facility
processes and an understanding of
its RCRA history?

X

2. Did the inspector conduct a
thorough walk-through of the
industrial processes and
associated hazardous waste
generation areas in the facility?
Were there any areas not
inspected? If so, why?

X

Oversight Inspection Form

Yes No Remarks

3. Did the inspector fail to note any violations or improper waste handling activities?

_____ ✓ _____

4. Did the inspector fail to identify any hazardous waste handling areas not previously identified in previous reports or records?

_____ ✓ _____

5. Upon identifying a potential violation, did the inspector initiate case development procedures (i.e., gather detailed evidence to support the findings of violations)?

_____ N/A _____

6. Did the inspector check the requirements for preparedness and prevention, including adequate aisle space, emergency equipment availability, and access to communications during hazardous waste handling operations?

_____ ✓ _____

7. If applicable, was sampling performed by State personnel in accordance with standard operating procedures specified by the State and/or EPA?

_____ N/A _____

8. Was proper safety and sampling equipment used to perform the sampling?

_____ N/A _____

9. Was the inspector helpful to the owner/operator by providing explanation of the regulations?

_____ ✓ _____

Oversight Inspection Form

Yes No Remarks

10. Was the inspector able to answer questions accurately or commit to provide answers at a later date?

✓

11. If the facility was permitted, did the inspector determine compliance with permit-specific conditions?

N/A

12. Did the inspector perform an exit interview with the owner/operator summarizing the key findings of the inspection?

✓

NOTE: The inspector should not make a finding of violation during the inspection, but should only discuss the findings.

VII. Knowledge of the Regulations

1. Was the inspector knowledgeable about hazardous waste regulations applicable to the facility?

✓

2. Was the inspector aware of recent amendments to the regulations that may affect the conduct of the inspection?

N/A

Oversight Inspection Form

Yes No Remarks or Not Applicable

III. Document Inspection (Review)

(Please note if review was performed prior to or during inspection)

1. Did the inspector thoroughly review the following documents?

A. For Generators:

- | | | |
|---|---|--|
| -Inspection records for hazardous waste storage areas | ✓ | |
| -Personnel training records | ✓ | |
| -Contingency plan | ✓ | State inspector asks for copy to review back at office in more detail. |
| -Emergency equipment testing and maintenance records | ✓ | |
| -Waste analysis records | ✓ | Company did not have them. |
| -Manifests and exception reports | ✓ | |
| -State annual and/or EPA biennial reports | ✓ | |
| -Waste minimization plan | ✓ | |

B. In addition, for TSDF's:

- | | | |
|--|-----|--|
| -Part A permit application or final issued permit | N/A | |
| -Part B application prior to permit issuance | N/A | |
| -Operating record | N/A | |
| -Waste analysis plan | N/A | |
| -Inspection schedule | N/A | |
| -Closure and Post Closure Plan | N/A | |
| -Financial instruments | N/A | |
| -Ground Water Monitoring/Reports | N/A | |
| -Other information (treatment plant operations, internal correspondence) | N/A | |

Oversight Inspection Form

PART 2

INSPECTION REPORT REVIEW

I. Review of Inspection Report

Yes No Remarks

1. Did the inspector submit the completed inspection report within the established SEA or grant deadlines?

✓

2. Did the inspection report contain factual observations rather than opinion?

✓

Comments:

3. Was the report accurate and did it sufficiently document all the violations? Were the regulations interpreted correctly?

✓

4. Did the report contain a discussion of changes that have occurred at the facility since the previous inspection?

N/A

If not explain items that should have been included:

5. Did the inspection report accurately reflect the EPA oversight inspector's observations? If not, explain the differences:

✓

Oversight Inspection Form

II. Remarks

1. What is your overall assessment of the inspection and the inspection report?

The inspector conducted a thorough inspection of the facility & records. The inspection report covered all the violations found at the site.

2. Describe recommendations that may improve the quality of the State inspection and/or inspection report?

None

NOTE: Indicate whether the inspector is in need of additional training or is lacking in a particular skill (e.g. hazardous waste sampling) needed for an adequate inspection.

3. Comments on the inspection that could have a bearing on the State inspector evaluation (e.g., facility status under litigation, inadequate time allocated to perform inspection, complex industrial processes and waste handling practices, or numerous regulated units located on site).

N/A

OhioEPA

Re: Tuscarawas County
Diversitech General
Hazardous Materials
OHD046630679

October 7, 1985

RECEIVED

OCT 09 1985

SOLID WASTE BRANCH
U.S. EPA, REGION V

Daniel J. Banaszek, Chief
Solid Waste Branch, Ohio Unit
USEPA, Region V 5 HW-12
230 South Dearborn
Chicago, Illinois 60604

Dear Sir:

Regarding solid waste management units at Diversitech (formerly General Tire):

In 1978, a large area of highly contaminated soils, containing phenols and chlorinated hydrocarbons, was paved over as a disposal site. This paving was done because contaminated runoff was resulting in NPDES violations. This area would qualify as a solid waste management unit requiring further assessment. Copies of relevant file correspondence is included. If you have any questions, please call me at this office.

Sincerely,



Brian J. Blair
Inspector
Division of Solid & Hazardous Waste Management

BJB:dm

cc: Chris Bowers, DSHWM, CO

SLr 1585

SMS-JCK-13

SLr 1585
100 SLr - 9 10/10/20

Mr. Chris Bowers
Ohio Environmental Protection
Agency - DSHMM
361 East Broad St.
P.O. Box 1049
Columbus, Ohio 43216-1049

Re: Corrective Action Response Review
DiversiTech General, Inc.
EPA I.D. #: OHD 046 630 679

Dear Mr. Bowers:

Enclosed is a copy of information we received from the referenced facility, addressing the "continuing release" provisions of the Hazardous and Solid Waste Amendments of 1984. Please review this information, and complete the enclosed form entitled "RCRA Facility Review for Solid Waste Management Units." We also encourage you to provide us any and all additional information that is pertinent to a consideration of continuing releases at this facility. We will take no final actions concerning this facility without your full participation in the decision-making process.

Please feel free to call the previously identified permit writer during the progress of your review with any questions or comments.

Sincerely yours,

Daniel J. Banaszek, Chief
Ohio Unit, Solid Waste Branch

Enclosure

cc: SED0 - Steve Hamlin ✓



August 21, 1985

Edith M. Ardiente, P.E.
Chief, Technical Programs Section
RCRA Activities
U.S. EPA - Region V
P. O. Box A3587
Chicago, Illinois 60609-3587

RECEIVED

AUG 26 1985

Subject: DiversiTech General, Inc.
Newcomerstown Plant
U.S. EPA I.D. No.: OHD 046 630 679 SWB-AIS
Request for Change in Status to: U.S. EPA, REGION V
"Generator Accumulating Waste On-Site
in Compliance with 40 CFR 262.34"

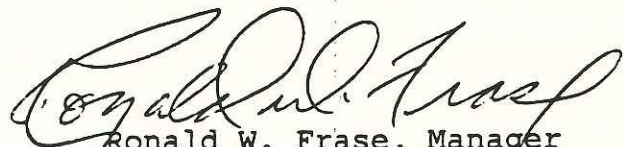
Dear Ms. Ardiente:

Pursuant to your letters of July 23, 1985 and of July 30, 1985 regarding our request to withdraw our Part A Hazardous Waste Permit Application, I have enclosed completed copies of a Request for Change in Status and a Certification Regarding Potential Releases from Solid Waste Management Units as you requested. I believe this information is sufficient to eliminate the need for a RCRA permit at this facility.

If additional information is required, please call me at (216) 798-2861.

Very truly yours,

DiversiTech General, Inc.


Ronald W. Frase, Manager
Environmental Engineering

RWF:sms:8

Attachments

cc: H. B. Thompson
W. Benkowski - Newcomerstown

COPY 2

One General Street Akron, Ohio 44329 (216) 798-0132



INTER-ORGANIZATION MEMO

TO: R. Laundrie

ATTENTION:

FROM: John Roba

DATE: September 26, 1978

SUBJECT: Compliance with EPA Limits on Phenols and Chlorinated Hydrocarbons

RECEIVED
SEP 18 1978
Ohio Environmental Protection
SOUTHEAST DISTRICT

We have been working on the phenol/chlorinated hydrocarbon problem for more than a year with some success but we still have more work to do to comply.

So far, the following have been done:

1. The area around the east side of the plant has been black-topped to prevent the phenols and hydrocarbons, which have built up in the soil over the years, from being leached out by rainfall.
2. A roof was built over the empty drum storage area. *Not done*
3. Bung covers are placed on empty drums to prevent spillage of the remnants.
4. The calender pits have been disconnected from the storm drains and have been piped to a separating tank.
5. A pit has been installed to collect the waste water from the floor scrubber. This pit is pumped out and discarded by an outside service.

The work that remains to be done is as follows:

1. Install an elevated platform at all stabilizer use areas so spillage can be collected and drained by gravity into a container. -- Art Maupin -- Completion October 6.
2. Pipe the #3 Calender, stabilizer area to use 90# stabilizer in tote bins rather than drums. -- Art Maupin -- Completion October 15, 1978.
3. Install a dike around the stabilizer use area at #3 Calender. Art Maupin -- October 6.
4. Reemphasize the absolute necessity for adherence to the EPA mandates with foremen and hourly personnel. -- Also the need to prevent spills, clean up spills, collect waste material in the proper containers, empty all drums completely, replace the bung covers on all empty drums. -- G. Marcincavage.

cc: R. Frase
R. Mueller
J. Southers
G. Mackey
W. Smith
A. Maupin
G. Marcincavage

John Roba
John Roba

SUMMARY OF NEWCOMERSTOWN PLANT'S ACTIONS TO CONTROL WASTEWATER DISCHARGE

Dec. 5, 1978 D

Feb-Mar 1977 -- Data Collected on Waste streams to characterize pollution load. 11

March 25, 1977 -- Letter sent to Newcomerstown Superintendent of water asking permission to discharge process waste into sanitary sewer.

June 1977 -- Containers distributed in plant to collect liquid waste.

July 1977 -- City's consultant recommends State EPA approval of plan before city can give permission.

September 1977 -- Application to OEPA for installation of equilization tank for pretreatment.

April 10, 1978 -- OEPA issues permit to install for tank.

April 1978 -- Old drum storage area paved with blacktop.

June 6, 1978 -- written permission from city to add process wastewater to sanitary sewer.

June 14, 1978 -- Application for renewal of NPDES permit submitted.

August 1978 -- Completed sump in compressor room and at #1 Calender.

September 1978 -- Completed installation of pump at seperating/equilizing tank and sump at #3 Calender.

October 1978 -- Racks with drain pans for stabilizer drums installed.

October 4, 1978 Drains flushed

Started pumping process waste to sanitary sewer.



THE GENERAL TIRE & RUBBER COMPANY

Chemical/Plastics Division * One General Street * Newcomerstown, Ohio 43832

Phone (614) 498-8304

February 16, 1978

RECEIVED

FEB 17 1978

U. S. Environmental Protection Agency
Region V Enforcement Division
1 North Wacker Drive
Chicago, Illinois 60606

Ohio Environmental Protection Agency
SOUTHEAST DISTRICT

Subject: Notification of Exceeding Permit Maximum--Permit Number 0004430

Gentlemen:

In January we started taking weekly samples from our outfall 001 so that we could identify the sources of high phenols and/or chlorinated hydrocarbons which have caused us to exceed the levels in our permit at times during the last year. The concentration was low for the first three samples taken, but the fourth on 1/25/78 exceeded the permit level for both parameters (see the attached data). Since there was rain that day, I obtained rainfall data for the past 13 months and compared the average concentration for samples taken on a day when rain was reported to that when there was no rain. The results are that the mean concentrations of both parameters were much higher for samples taken during rain than at other times.

In the past year we have taken several actions to prevent discharge of phenols and chlorinated hydrocarbons such as providing waste drums at points of use, better control of empty drums, and dikes around points of use. I think these have been successful in preventing excessive discharge from inside the plant. Rainfall related discharges have a phenol and chlorinated hydrocarbon contribution from an old drum storage area, possibly the roof or other areas. We had planned to remove the soil from this area to a landfill but could not find an acceptable location.

At this time we are evaluating sealing the soil with asphalt or concrete to prevent leaching by rainwater.

I have enclosed a summary of test results and rainfall data for 1977-78 to date. If you have any questions, please call.

Sincerely,

Arthur Maupin
Project Engineer

AM/km

cc: J. Roba
R. Frase
J. Southers

R. Laundrie
R. Mueller
G. Mackey

D. Schuetz—OEPA ✓



THE GENERAL TIRE & RUBBER COMPANY

Chemical/Plastics Division * One General Street * Newcomerstown, Ohio 43832
Phone (614) 498-8304

RECEIVED

MAY 23 1977

Ohio Environmental Protection Agency
SOUTHEAST DISTRICT

May 20, 1977

State of Ohio Environmental Protection Agency
Southeast District Office
Rt. 3 Box 603
Logan, Ohio 43138

Attention: David Shuetz, P.E.
District Engineer
Office of Water Pollution Control

Dear Mr. Shuetz:

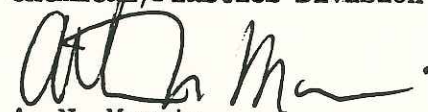
Since I received the results of our March NPDES tests, we have screened several raw materials that we use which were suspected of containing phenolic materials. Four of these contain amounts ranging from .005% to .08%.

These materials could enter the plant discharge stream through several ways including runoff from roof, through floor drains and the drum storage area. We know there is phenolic material in runoff from our roof but based on previous concentration data and the amount of rainfall that day, it would not account for all of the phenol reported. A soil sample taken from the drum storage area and extracted with distilled water was tested for phenol and the level was high enough so that runoff from this area could explain the high phenol level in our discharge stream. We plan to remove this contaminated soil and place it in a landfill. Improved procedures for drum handling will be implemented to prevent future soil contamination. In addition, we will continue our evaluation of raw materials to assure all phenol containing substances are identified.

If you have any questions, please call.

Sincerely,

THE GENERAL TIRE & RUBBER COMPANY
Chemical/Plastics Division


A. N. Maupin
Project Engineer

cc: R. Frase
R. Laundrie
R. Mueller
J. Roba

ANM/cld

P
Ohio EPA

Re: Tuscarawas County
GTR Plastic Film
Hazardous Materials
04-79-0428

OHD 046 630 679

GTR Plastic Film Company
One General Street
Newcomerstown, Ohio 43822

COAD

July 14, 1983

Attention: Arthur Maupin

Dear Sir:

This acknowledges the receipt of your July 1, 1983 letter. The corrections adequately address the deficiencies noted, and you are in apparent compliance with State and Federal hazardous waste regulations as a hazardous waste generator. I would highly recommend that you install a simple roof over the drum storage pad to prevent rainwater accumulation in the diked area.

If you have any questions, please call me at this office.

Sincerely,

Brian J. Blair
Inspector
Division of Hazardous Materials Management

BJB:dm

cc: Paula Cotter, DHMM, C.O.
cc: Ken Westlake, USEPA, Region V



Re: Tuscarawas County
GTR Plastic Film
Hazardous Materials
04-79-0428



GTR Plastic Film Company
One General Street
Newcomerstown, OH 43832

April 19, 1983

Attention Arthur Maupin

OH0046630679

Dear Sir:

On March 30, 1983, Ohio EPA conducted an inspection of your facility to determine compliance with State and Federal hazardous waste regulations. The following deficiencies were noted:

1. Drum Storage Area: Two (2) drums were being stored in the diked storage area. One (1) drum, dated 1-24-83, was leaking through a top seam into the diked area in violation of Section 3745-66-71 of the Ohio Administrative Code. The diked area was almost full of rainwater, containing some leaked waste. The leaking drum should be replaced immediately, and the water in the diked area should be removed and properly disposed.
2. Labelling: The second drum in the storage area was improperly labeled, bearing an old label from a waste load previously shipped. Previous shipment was verified by your inspection log. Each drum must bear an accurate accumulation date, as required by Section 3745-52-34.
3. Unknown Waste: A large cardboard box containing a grey powder was observed outside next to the metal collection box for the solid hazardous waste. The source of the powder was unknown. If this material is hazardous, it must be accumulated in a suitable container, such as the metal collection box.
4. Contingency Plan: Your contingency plan should contain measures to control leaking or spilled liquid waste, both inside and outside the diked area.
5. Personnel Training: The implementation of your contingency plan should be covered in the personnel training program, as required by Section 3745-65-16.
6. Inspections: Inspection records reveal that inspections of the drum storage area have not been conducted on a weekly basis, as required by Section 3745-66-74.

GTR Plastic Film Company

Page Two

April 15, 1983

MAY 2 1983

DIV. HAZARDOUS
MANAGEMENT

A copy of the inspection form is enclosed. Please correct the noted deficiencies within thirty (30) days and notify this office, in writing, of the corrections. If your permit is withdrawn, and you properly accumulate and store your hazardous waste for less than ninety (90) days, you will be considered solely a generator of hazardous waste. If you have any questions, please call me.

Sincerely,

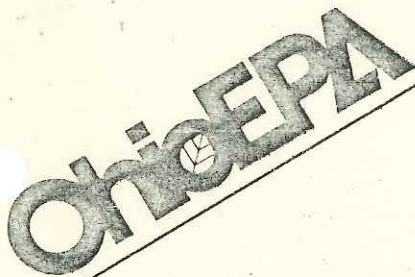


Brian J. Blair
Inspector
Hazardous Materials Management

BJB/kan

Enclosures

cc: Kathy Homer, U.S. EPA
cc: Ken Westlake, U.S. EPA
cc: Paula Cotter, Central Office



Re: Tuscarawas County
Hazardous Materials
GTR Plastic Film
04-79-0428

GTR Plastic Film Company
One General Street
Newcomerstown, Ohio 43832

July 23, 1982

Attention: Arthur Maupin

Dear Sir:

This acknowledges the receipt of your letter dated June 4, 1982, which addresses the problems noted in the April 29 inspection. The corrections outlined in that letter, adequately address the noted deficiencies, and you are in apparent compliance with interim status requirements. As you probably realize, the review of your status under Part B requirements may reveal the need for further improvements. If you have any questions, please call me at this office.

Sincerely,

Brian J. Blair
Environmental Scientist
Division of Hazardous Materials Management

BJB:dm

cc: Paula Cotter, DHMM, C.O.
cc: Kathy Homer, USEPA, Region V
cc: Bob Fragale, HWFAB

RECEIVED
JUL 26 1982
WASTE MANAGEMENT BRANCH
EPA, REGION V

Re: Tuscarawas County
GTR Plastic Film Company
Hazardous Materials
04-79-0428

Ohio EPA

GTR Plastic Film Company
One General Street
Newcomerstown, Ohio 43832

May 7, 1982

Attention: Arthur Maupin

Dear Sir:

On April 29, 1982, Ohio EPA conducted an inspection of your facility to determine compliance with State and Federal hazardous waste regulations. At that time, the following problems were noted:

1. Waste Analysis Plan - A written waste analysis plan should be developed and followed according to Section 3745-55-13 of the Ohio Administrative Code.
2. Equipment Maintenance - Your emergency skimmer and pump should be included in your equipment testing and inspection plan as per Section 3745-55-33. Documented inspections will help insure proper equipment operation in time of emergency.
3. Contingency Plan - Your contingency plan should describe actions to be taken for a spill, and should indicate the location of all emergency equipment (Section 3745-55-52).
4. Operating Record - The operating record should include the present physical location of each hazardous waste within the facility as required by Section 3745-55-73.

A copy of the form completed during the inspection is enclosed. Please correct these problems within 30 days and notify this office in writing of the corrections, including a revised copy of your contingency plan. If you have any questions about the inspection or about correcting the problems, please call me at this office.

Sincerely,

Brian J. Blair
Environmental Scientist
Division of Hazardous Materials Management

BJB:dm

cc: Kathy Homer, USEPA, Region V
cc: Paula Cotter, DHMM, C.O.
cc: Bob Fragale, HWFAB, C.O.

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OH0046630679

Facility: GTR Plastic Film Address: Rte 36 + 16 City: Newcomers town
 State: Ohio Zip Code: 43032 County: Tuscarawas Telephone: 614-498-5900
 Facility Operator: Arthur Maupin Title: Project Engineer Telephone: 498-5900

Facility Owner: Same Address: _____

City: _____ State: _____ Zip Code: _____ Telephone: _____

Type of Ownership: ☒ Private _____ Government _____ State HWFAB No. 04-79-0428

Date of Inspection: 4/29/83 Time of Inspection: (Start) 9:30 (Finish) 11:30

Advance Notification? ☐ No ☒ Yes: _____

Weather Conditions: Sunny Warm

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>Arthur Maupin</u>	<u>Project Engineer</u>	<u>498-5900</u>
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

(Name)

(Title)

(Telephone)

- | | | | |
|----|-----------------------|--------------------------------|---------------------|
| 1. | <u>Brian J. Blair</u> | <u>Environmental Scientist</u> | <u>614-385-8501</u> |
| 2. | _____ | _____ | _____ |
| 3. | _____ | _____ | _____ |
| 4. | _____ | _____ | _____ |

1. Type(s) of hazardous waste site activity: A. ☒ Generation B. ☒ Storage C. ☒ Treatment
 D. ☐ Transportation E. ☐ Disposal *Not Treating at this time*

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: _____

b) Non-Listed Wastes: I D001 C D002 R D003 X T D000

P006 D008

3. Has this facility submitted a Part A Permit Application? ☒ Yes ☐ No
4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?
☒ Yes, See Remark # _____ ☐ No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?
____ Yes, See Remark # ____ ☒ No
6. Does this facility transport hazardous waste materials off-site for itself or other generators?
____ Yes, Complete Part 3 (Transp.) ☒ No
- a) Applicable U.S. EPA I.D. Number _____
- b) Ohio P.U.C.O. GR TRSF Number _____
7. A brief description of site activity:

REMARKS, PART 1. (GENERAL INFORMATION)

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

5. The generator meets the following hazardous waste pre-transport requirements:

- a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A). ☒
- b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B. ☒
- c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33. ☒

6. The generator meets the following recordkeeping and reporting requirements:

- a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B. ☒ being sent
- b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable. ☒

7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50. ☒

8. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met: ☒

- a) Containers: the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking. ☒ has permit

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
b) The date that accumulation began is clearly marked on each container.	—	—	—	—
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	—	—	—	—
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	—	—	—	—
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	—	—	—	—
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	—	—	—	—
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	—	—	—	—
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	—	—	—	—
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	✓	—	—	—
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34. ☒

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 3. TRANSPORTER REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).	—	—	—	—
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52.	—	—	—	—
3. The transporter has signed the manifest as required by Section 263.20(b) and 3745-53-20-B and has carried the manifest with the waste shipment as required by 263.20(c) and 3745-53-20-C.	—	—	—	—
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20(d) and 3745-53-20-D and has retained a signed copy (available for inspection) for at least 3 years (263.22(a) and 3745-53-22-A).	—	—	—	—
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21).	—	—	—	—
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F.	—	—	—	—
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).	—	—	—	—
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	—	—	—	—
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30(a) and 3745-53-30-A).	—	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made?	—	—	—	—
c) Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31?	—	—	—	—
9. Does the transporter store hazardous wastes temporarily while they are in transit?	—	—	—	—
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12)	—	—	—	—

NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?	—	—	—	—
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?	—	—	—	—

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency

E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure

H: Financial Requirements

Subpart B: General Facility Standards

Yes No N/A Remark #

1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.

2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).

3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).

a) 24 hour surveillance system.

b) Artificial or natural barrier completely surrounding the active portion of the facility.

c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).

d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)				
a) Inspect emergency equipment.	✓			
b) Inspect monitoring equipment.	✓			
c) Inspect security, alarm and communications devices.	✓			
d) Inspect process equipment (pipes, pumps, etc.).	✓			
e) Inspect containment structures (dikes, curbs, etc.).	✓			
f) Inspect facility for structural malfunctions (roof, floor, etc.).	✓			
g) Inspect hazardous waste handling/loading areas each day used.	✓			
h) Record of any malfunctions due to equipment or operator errors.	✓			
i) Record of any hazardous waste discharges.	✓			
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	✓			
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	✓			
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).			✓	

RCRA INTERIM STATUS INSPECTION FORM

Yes	No	N/A	Remark #
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

- Protection from sources of ignition.
- Physical separation of incompatible waste materials.
- "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.
- Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.

Subpart C: Preparedness and Prevention

- Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31). *Small leaks have been controlled*
- If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).
 - Internal alarm system
 - Access to telephone, radio or other device for summoning emergency assistance.
 - Portable fire control equipment.
 - Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.
- All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33). *Skimmer + pump not tested*
- If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35). ☒ ☐ ☐

6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A). ☐ ☒ ☐

7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B). ☐ ☒ ☐

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:

a) Actions to be taken by personnel in the event of an emergency incident. ☒ ☐ ☐

b) Arrangements or agreements with local or state emergency authorities. ☒ ☐ ☐

c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. ☒ ☐ ☐

d) A list of all emergency equipment including location, physical description and outline of capabilities. ☒ ☐ ☐

e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F). ☒ ☐ ☐

2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53). ☒ ☐ ☐

describe actions for a spill

Location needed

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>used for oil spills</i>

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) The estimated (or actual) weight, volume or density of the waste material(s).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
e) The present physical location of each hazardous waste within the facility.	—	<input checked="" type="checkbox"/>	—	will add
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	—	—	—	—
g) Records of any waste analyses and trial tests required to be performed.	—	—	—	—
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	—	—	—	—
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	—	—	—	—
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	—	—	—	—
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	<input checked="" type="checkbox"/>	—	—	—

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77). ☒

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71). ☒

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	—	—	<u>X</u>	—
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	—	—	<u>X</u>	—
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.	—	—	<u>X</u>	—
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	—	—	<u>X</u>	—

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:	—	—	—	—
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	—	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

- b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C. — — — —
- c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D. — — — —

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

Yes No N/A Remark #

1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03) ✓ — — —

- a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1). ✓ — — —

- b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55, -56, -57, -58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out. ✓ — — —

- c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. ✓ — — —

- d) A description of steps taken to decontaminate facility equipment. ✓ — — —

- e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed. — — ✓ —

2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. ✓ — — —

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	—	—	—	—
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	—	—	✓	—
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	—	—	✓	—
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	—	—	✓	—
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	—	—	✓	—
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO <u>ONLY</u> DISPOSAL FACILITIES.				
5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	—	—	X	—
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	—	—	✓	—
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	—	—	✓	—
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	—	—	✓	—

RCRA INTERIM STATUS INSPECTION FORM

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
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9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.

—	—	<u>X</u>	—
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Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).

<u>✓</u>	—	—	—
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NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers
J: Management of Tanks
K: Surface Impoundments

L: Waste Piles
M: Land Treatment
N: Landfills

O: Incinerators
P: Thermal Treatment
Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

Yes No N/A Remark #

1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51, -52-53). ☒

2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54). ☒

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

Yes No N/A Remark #

3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56). ☒

4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B). ☒

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-foot cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.

2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).

3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).

4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).

5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).

a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.

b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).

a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.

b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.

7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).

8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).

9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).

Subpart K: Surface Impoundments

1. The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Sections 265.222 and 3745-57-03).

2. Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22 and 3745-57-04).

RCRA INTERIM STATUS INSPECTION FORM

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others
0 to 100.....	204 m 670 ft.
101 to 1,000.....	380 m 1,250 ft.
1,001 to 10,000.....	530 m 1,730 ft.
10,001 to 30,000.....	690 m 2,260 ft.

Subpart Q: Chemical, Physical and Biological Treatment

Note: waste treatment system not used at this time.

	Yes	No	N/A	Remark #
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	manual feed
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are inspection procedures followed according to 265.403?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are the special requirements fulfilled for ignitable or reactive wastes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
6. Are incompatible waste treated? (If yes, 265.17(b) applies.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

NOTE: EPA HAS TEMPORARILY SUSPENDED THE APPLICABILITY OF THE REQUIREMENTS OF THE HAZARDOUS WASTE REGULATIONS IN 40 CFR PARTS 122, 264 AND 265 TO OWNERS AND OPERATORS OF (1) WASTEWATER TREATMENT TANKS THAT RECEIVE, STORE, AND TREAT WASTEWATERS THAT ARE HAZARDOUS WASTE OR THAT GENERATE, STORE OR TREAT A WASTEWATER TREATMENT SLUDGE WHICH IS A HAZARDOUS WASTE WHERE SUCH WASTEWATERS ARE SUBJECT TO REGULATION UNDER SECTIONS 402 OR 307(b) OF THE CLEAN WATER ACT (33 U.S.C. 1251 ET SEQ.) AND (2) NEUTRALIZATION TANKS, TRANSPORT VEHICLES, VESSELS, OR CONTAINERS WHICH NEUTRALIZE WASTES WHICH ARE HAZARDOUS ONLY BECAUSE THEY EXHIBIT THE CORROSIVITY CHARACTERISTIC UNDER 40 CFR 261.22 OR ARE LISTED AS HAZARDOUS WASTES IN SUBPART D OF 40 CFR PART 261 ONLY FOR THIS REASON.

-30-82 15:30
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

HMFBAB # 04-79-0928

U.S. EPA I.D. # OH0046630679

Facility: GTR Plastic Film Address: One General Street City: Newcomers Town

State: Ohio Zip Code: 43832 County: Tuscarawas Telephone: 498-5900

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	<u>Jack Martin</u>		<u>498-5900</u>
2.			
3.			
		INSPECTOR(S)	
1.	<u>Brian Blair</u>	<u>Inspector</u>	<u>614-385-8501</u>
2.			
3.			

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which regulations are applicable.

<input checked="" type="checkbox"/> Generator only (G)	<input type="checkbox"/> General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure	<input type="checkbox"/> Waste Piles S03
<input type="checkbox"/> Transporter (T)		<input type="checkbox"/> Land Treatment D81
<input type="checkbox"/> TSDF only	<input type="checkbox"/> Containers S01	<input type="checkbox"/> Landfills D80
<input type="checkbox"/> G-T	<input type="checkbox"/> Tanks S02/T01	<input type="checkbox"/> Chemical/Physical/Biological T04
<input type="checkbox"/> G-TSDF	<input type="checkbox"/> Surface Impoundments S04/T02	<input type="checkbox"/> Groundwater Monitoring
<input type="checkbox"/> T-TSDF	<input type="checkbox"/> Incineration/Thermal Treatment	<input type="checkbox"/> Post-Closure
<input type="checkbox"/> G-T-TSDF		

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?
2. If "yes", is it complete and accurate?
3. Has the facility submitted a Part B?

Yes	No	N/A	Remark #
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

REMARKS, PART 1. GENERAL INFORMATION

Include a brief description of site activity and waste handling.

This is a permitted TSDF which has decided to withdraw and not submit a Part B.

1. Jack Noddy
(Name)

State: Ohio

County: Allen

City: London

Address: 1000 N. High St.

Zip: 43031

Facility: ELK 6/24/82

Inspection Date: 6/24/82

Inspector: John J. Smith

Part 1. GENERAL INFORMATION

Inspection Status: Inspection

Date: 6/24/82

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Doc book
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

5. The generator meets the following hazardous waste pre-transport requirements:

a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))

✓ — — —

b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b).

— ✓ — *accumulation date incorrect*

c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.

— — ✓ —

6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.

— — ✓ —

7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:

a) The containers are clearly marked with the words "Hazardous Waste".

✓ — — — *one incorrect*

b) The date that accumulation began is clearly marked on each container.

— — — — *old country plus*

8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34).

9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).

✓ — — —

RCRA INTERIM STATUS INSPECTION FORM

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

1983 Inspections not done every week

Contingency plan - be more specific for drum leakage - before liquids reach the storm ditch (ie: to prevent the need for the berm)

Training - cover contingency plan

One leaking drum

One drum - incorrect accumulation date

a cardboard box containing grey powder was located next to "Controlled waste" collection box. Mr. Martin did not know if this powder was hazardous

Permitted storage facility, has reverted to Generator only status

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)
 - a) Internal alarm system.
 - b) Access to telephone, radio or other device for summoning emergency assistance.
 - c) Portable fire control equipment.
 - d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a))
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b))

Yes No N/A Remark #

Inside
Tank spilled
into dike area,
pumped out and
saved.

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark II

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident. ☒ *needs more spill*
 - b) Arrangements or agreements with local or state emergency authorities. ☒
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. ☒
 - d) A list of all emergency equipment including location, physical description and outline of capabilities. ☒
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) ☒
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) ☒
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) ☒
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) ☒
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56. ☒

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers
J: Management of Tanks
K: Surface Impoundments

L: Waste Piles
M: Land Treatment
N: Landfills

O: Incinerators
P: Thermal Treatment
Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

1. Hazardous wastes are stored in containers which are:

a) Closed (265.173)

b) In good physical condition (265.171)

c) Compatible with the wastes stored in them (265.172)

2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))

3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))

4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)

5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).

6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c))

Yes	No	N/A	Remark #
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	the leaking top seam
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	one leak
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	document not weekly
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A.- General Facility Standards.

I. General Information:

- (A) Facility Name: GTR Plastic Film Company
(B) Street: 1 General St.
(C) City: Newcomerstown (D) State: Ohio (E) Zip Code: 43832
(F) Phone: (614) 498-8304 (G) County: Tuscarawas
(H) Operator: SAME AS ABOVE
(I) Street: _____
(J) City: _____ (K) State: _____ (L) Zip Code: _____
(M) Phone: _____ (N) County: _____
(O) Owner: The General Tire & Rubber Company
(P) Street: 1 General St.
(Q) City: Akron (R) State: Ohio (S) Zip Code: 44329
(T) Phone: 216 798-3000 (U) County: Summit
(V) Date of Inspection: 5/13/81 (W) Time of Inspection (From) 10:00 (To) _____
(X) Weather Conditions: 65° F HAZY SUNSHINE

(Y) Person(s) Interviewed

Title

Telephone

Arthur N. Maupin

Project Engineer

498-8309

Bill Russell

Plant Engineer

"

Cliff McDonald

Plant Mgr

"

(Z) Inspection Participants

Agency/Title

Telephone

Patrick H. Gorman

OEPA/Solid Waste Scientist

385-8501

(AA) Preparer Information

Name

Agency/Title

Telephone

Patrick H. Gorman

OEPA/

385-9301

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

☒ A. Storage and/or Treatment

1. Containers (I)
2. Tanks (J)
3. Surface Impoundments (K)
4. Waste Piles (L)

☐ D. Incineration and/or Thermal Treatment
(O and P)

☒ E. Chemical, Physical, and Biological
Treatment (Q)

Used Until Jan. 18, 1981

158 batches @ 200 lbs

190 lbs each

60 lbs plastic

Plastic encapsulation

☐ B. Land Treatment (M)

☐ C. Landfills (N)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	<u> </u>	<u>X</u>	<u>X</u>	
2. Facility expansion?	<u> </u>	<u>X</u>	<u>X</u>	
 (B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>X</u>	<u>X</u>		<i>Most waste identified Flow equalization sludge needs testing tank</i>
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>X</u>			
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?			<u>X</u>	
 (C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<u>X</u>			
2. Artificial or natural barrier around facility?	<u>X</u>			
3. Controlled entry?	<u>X</u>			
4. Danger sign(s) at entrance?			<u>X</u>	
 (D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	<u>X</u>			
2. Records of operator error?	<u>X</u>	<u>X</u>		<i>Not complete, overfilling of containers not noted.</i>
3. Records of discharges?	<u>X</u>			

t Inspected

	Yes	No	NI	Remarks
4. Inspection schedule?	---	<input checked="" type="checkbox"/>	---	<u>No container inspection</u>
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	---	---	-----
6. Security devices?	<input checked="" type="checkbox"/>	---	---	-----
7. Operating and structural devices?	---	<input checked="" type="checkbox"/>	---	<u>area of containers filling and storage</u>
8. Inspection log?	---	<input checked="" type="checkbox"/>	---	-----
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	---	<input checked="" type="checkbox"/>	---	<u>Not for all positions</u>
2. Job descriptions?	---	<input checked="" type="checkbox"/>	---	"
3. Description of training?	---	<input checked="" type="checkbox"/>	---	"
4. Records of training?	---	<input checked="" type="checkbox"/>	---	"
5. Have facility personnel received required training by 5-19-81?	<input checked="" type="checkbox"/>	---	<input checked="" type="checkbox"/>	-----
6. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	---	---	-----
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	---	---	<input checked="" type="checkbox"/>	<u>Not needed</u>
2. No smoking signs?	---	---	<input checked="" type="checkbox"/>	-----
3. Separation and protection from ignition sources?	---	---	<input checked="" type="checkbox"/>	-----

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

Yes No NI* Remarks

☒ ☒ ☐

(B) If required, does the facility
have the following equipment:

1. Internal communications or
alarm systems?
2. Telephone or 2-way radios
at the scene of operations?
3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

☒ ☐ ☐

☒ ☐ ☐

☒ ☐ ☐

Indicate the volume of water and/or foam available for fire control:

4 2 1/2" hose at 100 PSI

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?
2. Is emergency equipment
maintained in operable
conditions?

☒ ☐ ☐

☒ ☐ ☐

(D) Has owner or operator provided
immediate access to internal
alarms? (if needed)

☒ ☐ ☐

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement? X

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

X

2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

X

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

X

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

X

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

 X

*Not Inspected

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<u>X</u>	—	—	_____
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<u>X</u>	—	—	_____
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>	—	—	_____
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>	—	—	_____
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<u>X</u>	—	—	_____

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<u>X</u>	—	—	_____
2. Are records of past shipments retained for 3 years?	—	—	<u>X</u>	_____
(B) Does the owner or operator meet requirements regarding manifest discrepancies?				
	—	—	<u>X</u>	<u>No discrepancies</u>

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

— X —

see below

2. Does the operating record contain the following information:

- **b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

— X —

Flow equalization

TANK sludge needs to be
tested to be disposed of.
Sludge accumulated April 20.

- c. The location and quantity of each hazardous waste within the facility?

X — —

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— — —

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X X —

No inspection records

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

X — —

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

X — —

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

(A) Closure and Post-Closure

1. Is the facility post-closure plan available for inspection by May 19, 1981?

Yes

No

NI

Remarks

☒☐☐

2. Has this plan been submitted to the Regional Administrator?

☐☒☐

3. Has post-closure begun?

☐☒☐

4. Is the written post-closure cost estimate available by May 19, 1981?

☐☐☒

(B) Post-closure care and use of property

1. Is the facility post-closure plan available for inspection by May 19, 1981?

☒☐☐

2. Has this plan been submitted to the Regional Administrator?

☐☒☐

3. Has post-closure begun?

☐☒☐

4. Is the written post-closure cost estimate available by May 19, 1981?

☐☐☒VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I

USE AND MANAGEMENT OF CONTAINERS

Facility Name: GTR FilmDate of Inspection: 5/13/81

Yes

No

NI*

Remarks

1. Are containers in good condition:

☒☐☐

2. Are containers compatible with waste in them?

☒☐☐

4. Are containers managed to prevent leaks?

☐☒☐

5. Are containers inspected weekly for leaks and defects?

☐☒☐

6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line?

☐☐☒

(Indicate if waste is ignitable or reactive.)

☐☐☒

HOPPER
Overfilled and spilling out
some barrels not closed
No documentation of
inspections.

7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)

___ ___ ☒ No incompat

8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?

___ ___ ☒ _____

J
TANKS

Facility Name: _____

Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?

___ ___ ___ _____

2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?

___ ___ ___ _____

3. Do continuous feed systems have a waste-feed cutoff?

___ ___ ___ _____

4. Are waste analyses done before the tanks are used to store a substantially different waste than before?

___ ___ ___ _____

5. Are required daily and weekly inspections done?

___ ___ ___ _____

6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

___ ___ ___ _____

7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)

___ ___ ___ _____

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: _____

Date of Inspection: _____

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?

2. Do earthen dikes have protective covers?

3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?

4. Is the freeboard level inspected at least daily?

5. Are the dikes inspected weekly for evidence of leaks or deterioration?

6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

WASTE PILES

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	-----
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	-----
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	-----
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	-----
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	-----
7. Are piles of incompatible waste protected by barriers or distance from other waste?	---	---	---	-----

LAND TREATMENT

Facility Name: _____

Date of Inspection: _____

1. Is treated hazardous waste capable of biological or chemical degradation?

2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?

3. Is waste analyzed according to 265.273?

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?

7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)

N
LANDFILLS

Facility Name: _____ Date of Inspection: _____

Yes No NI* Remarks

(A) General Operating Requirements

Does the facility provide the following:

**1. Diversion of run-on away from active portions of the fill? _____

**2. Collection of run-off from active portions of the fill? _____

**3. Is collected run off treated? _____

4. Control of wind dispersal of hazardous waste? _____

(**Effective 11-19-81)

(B) Surveying and Recordkeeping

Does the Operating Record Include:

1. A map showing the exact location and dimensions of each cell? _____

2. The contents of each cell and the location of each hazardous waste type within each cell? _____

(C) Closure and Post-Closure

1. Is the Closure Plan available for inspection by 5-19-81? _____

2. Has this plan been submitted to the Regional Administrator? _____

3. Has closure begun? _____

4. Is closure cost estimate available by 5-19-81? _____

(D) Special requirements for ignitable or reactive waste

Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive? _____

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(E) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?	_____	_____	_____	_____
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	_____	_____	_____	_____
2. Does the landfill have a chemically and physically resistant liner system?	_____	_____	_____	_____
3. Does the landfill have a functional leachate collection system?	_____	_____	_____	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	_____	_____	_____	_____
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	_____	_____	_____	_____

*Not Inspected

O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

t Inspected

2. Has documented or written data been substituted or analysis of either:

a. Lead? _____

b. Mercury? _____

B. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

Remarks

1. _____

2. _____

3. _____

4. _____

5. _____

III. Monitoring and Inspections

	Yes	No	NI*	Remarks
A. Are combustion/emission control instruments monitored at least every 15 minutes?	_____	_____	_____	_____
B. Is steady state maintained or corrections attempted?	_____	_____	_____	_____
C. Is stack plume observed at least hourly for normal color and opacity?	_____	_____	_____	_____
D. Did any stack observations made by owner or operator show a plume different than normal?**	_____	_____	_____	_____
E. If yes to D above, were corrections made to return emissions to normal appearance?**	_____	_____	_____	_____
F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	_____	_____	_____	_____
G. Are emergency shutdown controls and system alarms checked daily for proper operation?	_____	_____	_____	_____

*Not Inspected

Specify in Remarks for what period of time this was checked.

A. Only complete this part if the facility open burns hazardous waste.

Yes No NI* Remarks

1. Does this facility burn only waste explosives?

(A No answer means other hazardous waste is open-burned.)

2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
---	--	--

0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name:

GTR Film

Date of Inspection:

5/5/81

Yes No NI* Remarks

1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?

X

2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)

X

Batch Treatment

*Not Inspected

Treatment ended Jan. 81
after economic decision
to use landfill

	Yes	No	NI*	Remarks
Has the owner or operator addressed the waste analysis requirements of 265.402?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are inspection procedures followed according to 265.403?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<i>No inspection of containers</i>
5. Are the special requirements fulfilled for ignitable or reactive wastes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the owner or operator submit exception reports when needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>Not needed</u>

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) If required, are placards available to transporters of hazardous waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	—	X	—	—
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	—	X	—	—
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line)?	—	X	—	—
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	—	—	X	No tanks
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	—	—	X	No tanks
c. Do continuous feed systems have a waste-feed cutoff?	—	—	X	—
d. Are required daily and weekly inspections done?	—	X	X	—
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?)	—	—	X	—
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	—	—	X	—

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	—	—	<u>X</u>	<u>Not APPLICABLE</u>
(B) Has the generator submitted Annual Reports and Exception Reports as required?	—	—	<u>X</u>	_____

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	—	<u>X</u>	—	_____
--	---	----------	---	-------

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	—	—	—	_____
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	—	—	—	_____
c. Met the Manifest requirements?	—	—	—	_____
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	—	—	—	_____

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	_____	_____	_____	_____

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	_____	_____	_____	_____
B. Are signed completed manifest(s) on file?	_____	_____	_____	_____

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	_____	_____	_____	_____
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	_____	_____	_____	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Ohio EPA

Cliff McDonald, Plant Manager
GTR Plastic Film Company
1 General Street
Newcomerstown, Ohio 43832

RECEIVED

MAY 27 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V

May 20, 1981

Dear Sir:

The Ohio Environmental Protection Agency is cooperating with the USEPA Region V in carrying out the provisions of the Resource Conservation and Recovery Act of 1976, Public Law 94-580. In this effort, personnel of the Ohio EPA are conducting inspections of facilities in Ohio that are engaged in the generation, transportation, storage, treatment or disposal of hazardous waste materials.

This letter is to inform you that on May 13, 1981, an inspection of your facility, GTR Plastic Film Company in Newcomerstown was conducted by Patrick Gorman, from the Southeast District Office of the Ohio EPA. Your firm was represented by Arthur Maupin and Bill Russell. The following concerns pertaining to the operation of your facility were noted:

Waste Analysis

Although most of the plant's wastes had been tested according to the regulations, the sludge from the cleaning of the flow equalization tank will need to be tested before disposal.

Inspections

40 CFR 265.15 requires that an inspection program be established for all treatment, storage, and disposal facilities. Your program was incomplete because the area where the drums are stored and the outside area where the hopper is located were not inspected weekly for signs of leaks, or defects, or spillage. The inspections need to be documented and performed at least weekly.

Training

40 CFR 265.16 requires facility personnel to be trained in the safe operation of the facility. Minimum training includes instruction in safe equipment operation and emergency response procedures. Your training program needs to be expanded to include all of the plant personnel who deal with the waste rather than just supervisors. Each different job classification needs a specific title with the duties clearly spelled out. Each person in that classification should receive the training so that they can adequately perform their duties. Training records will need to be documented. Someone's job description needs to be expanded to include the inspection of your storage areas for the overfilling or leaks of the containers. Any spillage or leaks should be reported to supervisors and corrected.

GTR Plastic Film Company
May 20, 1981
Page 2

A copy of this letter and the inspection report will be sent to the USEPA Region V office in Chicago. Any enforcement action related to this inspection will be initiated by USEPA's Enforcement Division; in that case USEPA will of course contact you. If you have any questions, please contact me (614-385-8501) or Ms. Brenda Lillstrom (312-886-3899) of the USEPA, Region V.

Sincerely,

Patrick H. Gorman
Solid Waste Scientist
Office of Land Pollution Control

PHG:dm

cc: Tuscarawas County Health Department
cc: Hazardous Waste Task Force, C.O.
cc: Brenda Lillstrom, USEPA, Region V

**D. Corrective
Action**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

RECEIVED
WMD RCRA
RECORD CENTER

MAY 06 1993

Comp

REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Bob Young
Project Engineer
GenCorp Polymer Products
One General Street
Newcomerstown, Ohio 43832

Re: Visual Site Inspection
GenCorp Polymer Products
Newcomerstown, Ohio
OHD 046 630 679

Dear Mr. Young:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

10/4/92
RECEIVED
WMD RCRA
RECORD CENTER

REPLY TO THE ATTENTION OF:
HRE-8J

November 12, 1992

Mr. Ralph Sulser
Gencorp, Inc.
One General Street
Newcomerstown, Ohio 43822

Re: Visual Site Inspection
Gencorp, Inc.
Newcomerstown, Ohio 43822
OHD 046 630 679

Dear Mr. Sulser:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

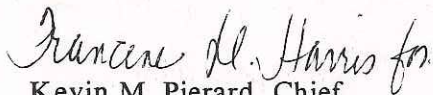
The VSI has been scheduled for December 9, 1992, at 9:00 a.m. The inspection team will consist of Pete Zelinkas and Christine Hirschman of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Ohio Environmental Protection Agency (OEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

Mr. Ralph Sulser
November 30, 1992
Page 2

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,



Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Ed Lim, OEPA Central Office
Steve Rath, OEPA Central District Office

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

1. Two copies of a detailed map of the facility
2. Facility history, including dates of operation, ownership changes, and production processes
3. Current facility operations
4. Processes that generate waste that is treated, stored, or disposed of at the facility
5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
6. Security at the facility
7. Information regarding geology and the uses of ground water and surface water in the area
8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
9. Records of any spills that may have occurred at the facility
10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU



U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006



TES 9

**Technical Enforcement Support
at Hazardous Waste Sites
Zone III
Regions 5,6, and 7**

PRC

PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**GENCORP POLYMER PRODUCTS
NEWCOMERSTOWN, OHIO
OHD 046 630 679**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHD 046 630 679
Date Prepared	:	March 10, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087OH4K
Prepared by	:	PRC Environmental Management, Inc. (Christine Hirschman)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the GenCorp Polymer Products (GenCorp) facility in Newcomerstown, Tuscarawas County, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The GenCorp facility produces rigid plastic calendered film and thick press-laminated sheet. GenCorp operates as a RCRA generator of hazardous waste with less than 90-day storage. The facility generates small quantities of non-specified hazardous waste solids and liquids, and oils and grease containing barium (D005), cadmium (D006), chromium (D007) and lead (D008). The facility also generates waste petroleum naphtha (D001), nonhazardous wastewater, and empty drums.

Facility operations began in 1955, and have remained the same since the facility's opening. GenCorp employs about 160 people over three shifts. The facility has gone through a series of ownership changes since its opening in 1955. It was first owned by Seiberling Tire and Rubber Company. In 1965, it was sold to Seilon, Inc., when Seiberling Tire and Rubber was dissolved. General Tire and Rubber has owned and operated the facility since 1968, although it has gone through several name changes, finally changing to GenCorp in 1984.

The facility filed a Notification of Hazardous Waste Activity form with EPA in 1980. A Part A permit application was filed in April 1981, identifying GenCorp as a treatment, storage, or disposal facility with the treatment and storage of waste in containers. Hazardous waste was stored in the Waste Storage Area (SWMU 6).

In February 1983, GenCorp requested withdrawal of its Part A permit application. In 1985, the Ohio Environmental Protection Agency (OEPA) acknowledged that GenCorp had certified that hazardous waste activity at the facility did not require a permit. OEPA granted a status change to that of a generator of hazardous waste with less than 90-day storage. No documentation is available indicating that the Waste Storage Area (SWMU 6) underwent RCRA closure or if EPA approved the status change.

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- A EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C VISUAL SITE INSPECTION FIELD NOTES

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PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the GenCorp Polymer Products (GenCorp) facility in Newcomerstown, Tuscarawas County, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The GenCorp facility produces rigid plastic calendered film and thick press-laminated sheet. GenCorp operates as a RCRA generator of hazardous waste with less than 90-day storage. The facility generates small quantities of non-specified hazardous waste solids and liquids, and oils and grease containing barium (D005), cadmium (D006), chromium (D007) and lead (D008). The facility also generates waste petroleum naphtha (D001), nonhazardous wastewater, and empty drums.

Facility operations began in 1955, and have remained the same since the facility's opening. GenCorp employs about 160 people over three shifts. The facility has gone through a series of ownership changes since its opening in 1955. It was first owned by Seiberling Tire and Rubber Company. In 1965, it was sold to Seilon, Inc., when Seiberling Tire and Rubber was dissolved. General Tire and Rubber has owned and operated the facility since 1968, although it has gone through several name changes, finally changing to GenCorp in 1984.

The facility filed a Notification of Hazardous Waste Activity form with EPA in 1980. A Part A permit application was filed in April 1981, identifying GenCorp as a treatment, storage, or disposal facility with the treatment and storage of waste in containers. Hazardous waste was stored in the Waste Storage Area (SWMU 6).

In February 1983, GenCorp requested withdrawal of its Part A permit application. In 1985, the Ohio Environmental Protection Agency (OEPA) acknowledged that GenCorp had certified that hazardous waste activity at the facility did not require a permit. OEPA granted a status change to that of a generator of hazardous waste with less than 90-day storage. No documentation is available indicating that the Waste Storage Area (SWMU 6) underwent RCRA closure or if EPA approved the status change.

The GenCorp facility occupies 23 acres in a mixed residential-commercial area of Newcomerstown. The closest residential area is about 500 feet west of the facility. About 2,000 private residences are located within 1 mile of the facility. GenCorp is surrounded by a 6-foot-high, chain-link fence and is monitored 24 hours a day with television cameras and by security personnel.

The PA/VSI identified the following nine SWMUs and no AOCs at the facility:

Solid Waste Management Units

1. Solid Waste Accumulation Areas (18)
2. Liquid Waste Satellite Accumulation Areas (3)
3. Oil-Water Separators (3)
4. Temporary Hazardous Waste Storage Area
5. Dust Roll-Off
6. Waste Storage Area
7. Empty Drum Storage Area
8. Oil-Contaminated Water Storage Tank
9. Banbury Mixers (3)

The potential for release of hazardous substances to on-site soils and ground water is low because of sound containment. The Solid Waste Accumulation Areas (SWMU 1) and Liquid Waste Satellite Accumulation Areas (SWMU 2) and the Oil-Water Separators (SWMU 3) are located indoors, on top of concrete surfaces. The Temporary Hazardous Waste Accumulation Area (SWMU 4) is also indoors, on top of concrete. The Dust Roll-Off (SWMU 5) and the Waste Storage Area (SWMU 6) have adequate containment. The Empty Drum Storage Area (SWMU 7) does not store hazardous substances. The Oil-Contaminated Water Storage Tank (SWMU 8) is diked and equipped with a high-level alarm. The Banbury Mixers (SWMU 9) are located indoors, on top of concrete. No documented releases to on-site soils or ground water have occurred at the facility.

Ground water is used as the primary source for drinking water in the area. The well system for Newcomerstown is about 0.5 mile southwest and downgradient from the facility. The wells are screened in sand and gravel at about 123 feet. The Gencorp facility has three industrial wells which are used for process and sanitary water. These wells are screened in sand and gravel at about 100 feet.

The potential for a release of hazardous substances to surface water is low. All SWMUs are equipped with secondary containment limiting the potential for release. The nearest surface water body is an unnamed branch of the Tuscarawas River located at the eastern border of the facility. The branch joins the Tuscarawas River about 0.25 mile south of the facility. The

facility has a National Pollutant Discharge Elimination System (NPDES) permit for an outfall to the unnamed branch. Gencorp has had no documented NPDES violations. No drinking water intakes are located along the Tuscarawas River.

The potential for a release of hazardous substances to air is low. All SWMUs have adequate containment. The facility possesses a total of 13 air permits which are used for registration status only. These permits apply to the calenders, extruders, and mixers used in the plastic manufacturing process. The facility has no history of odor complaints from nearby residents.

Because no sensitive environments are located within 2 miles of the facility and because GenCorp has no documented NPDES violations, the threat posed to ecological receptors is low.

PRC recommends the facility submit a closure plan to OEPA for the Waste Storage Area (SWMU 6). PRC recommends no further action for all other SWMUs.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the GenCorp Polymer Products (GenCorp) facility (EPA Identification No. OHD 046 630 679) in Newcomerstown, Tuscarawas County, Ohio. The PA was completed on December 4, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) and from EPA Region 5 RCRA files. The VSI was conducted on December 9, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified nine SWMUs and no AOCs at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and eight inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

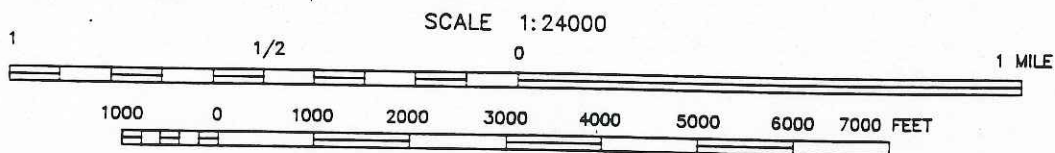
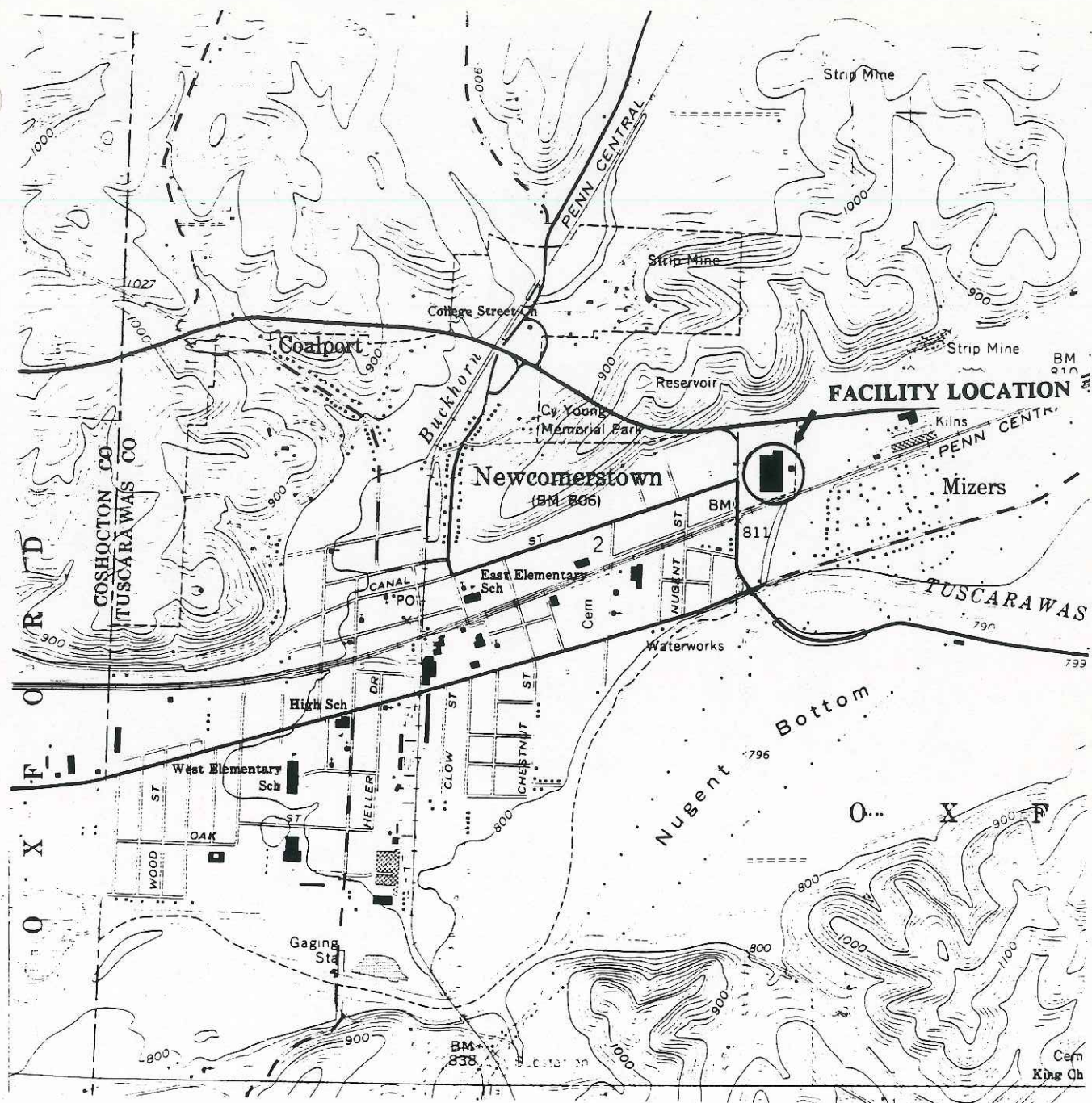
The GenCorp facility is located at One General Street in Newcomerstown, Ohio, in Tuscarawas County (latitude 40° 16' 44"N, longitude 81° 35' 23"W), as shown in Figure 1. The facility occupies 23 acres in a mixed-use area. The facility is bordered to the north by State Route 36, to the east by an unnamed tributary of the Tuscarawas River, to the south by Penn Central railroad tracks, and to the west by a residential area.

2.2 FACILITY OPERATIONS

The GenCorp facility opened in 1955 as a division of the Seiberling Tire and Rubber Company (Seiberling). In 1965 it was sold to Seilon, Inc., following the dissolution of Seiberling. In 1968 the company was purchased by the General Tire and Rubber Company. General Tire and Rubber went through a series of name changes until 1984, when its name was changed to GenCorp to show that its capabilities were beyond those of a tire and rubber company. GenCorp currently employs about 160 people over three shifts. Operations have remained the same since the facility opened in 1955.

GenCorp produces rigid plastic calendered film and thick press-laminated sheeting. This process entails mixing polyvinyl chloride (PVC) resin, pigments, and various stabilizers and additives. This mixture is either pressed through heated, revolving rollers to produce a desired thickness and texture (calendering); conveyed through a heated machine barrel which is then pushed through a die (extrusion); or pressed together to form a solid, thick sheet of material (press laminating). The resulting products are used by the aerospace, automotive, and lithographic industries (GenCorp, 1990).

PRC identified nine SWMUs and no AOCs (see Table 1). The facility layout, including SWMUs, is shown in Figure 2.



QUADRANGLE LOCATION

SOURCE: Modified from USGS, 1972.

GENCORP POLYMER PRODUCTS
NEWCOMERSTOWN, OHIO

FIGURE 1
FACILITY LOCATION

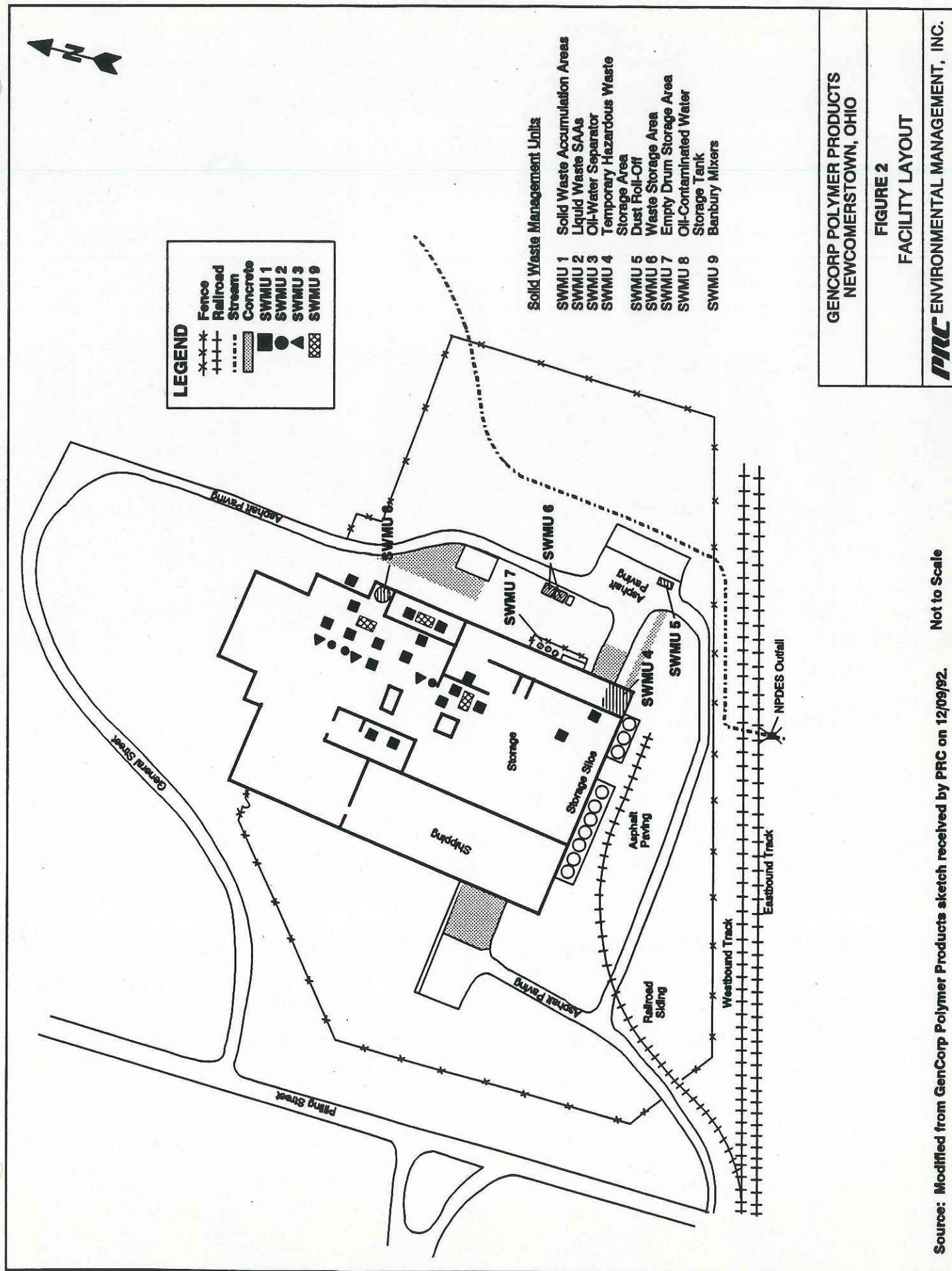
PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 1
SOLID WASTE MANAGEMENT UNITS

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit^a</u>	<u>Status</u>
1	Solid Waste Accumulation Areas (18)	No	Active
2	Liquid Waste Satellite Accumulation Areas (SAA) (3)	No	Active
3	Oil-Water Separators (3)	No	Active
4	Temporary Hazardous Waste Storage Area	No	Active
5	Dust Roll-Off	No	Active
6	Waste Storage Area	Yes	Active; less than 90-day storage (formerly used for greater than 90-day storage; however, the unit has not undergone RCRA closure.)
7	Empty Drum Storage Area	No	Active
8	Oil-Contaminated Water Storage Tank	No	Active
9	Banbury Mixers (3)	No	Active; unit is no longer used for treatment

Note:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



2.3

WASTE GENERATION AND MANAGEMENT

GenCorp generates non-specified hazardous solids, non-specified hazardous liquids, waste petroleum naphtha, contaminated waste oil and grease, wastewater, and empty drums (see Table 2).

Non-specified hazardous waste solids containing barium, cadmium, chromium, and lead (D005, D006, D007, and D008), including dust, saw kerf, and floor sweepings are generated at various areas around the facility.

Discharge from dust collectors is accumulated in 1- to 2-cubic-yard containers at five Solid Waste Accumulation Areas (SWMU 1) around the GenCorp facility. When the dust containers are full, they are placed in the Temporary Hazardous Waste Storage Area (SWMU 4). The dust (D005, D006, D007, D008) is eventually taken to the 30-cubic-yard Dust Roll-Off (SWMU 5). Every 90 days, Michigan Disposal, Inc. (Michigan Disposal), or Chemical Waste Management transports the waste to landfills in Belleville, Michigan, or Emelle, Alabama. The roll-off is replaced following its removal.

Saw kerf (D005, D006, D007, D008) is accumulated at one Solid Waste Accumulation Area (SWMU 1). When the container is full, it is placed in the Temporary Hazardous Waste Storage Area (SWMU 4). The container is then transported to the Dust Roll-Off (SWMU 5), which is transported to landfills in Belleville, Michigan, or Emelle, Alabama, by Michigan Disposal or Chemical Waste Management at the end of 90 days. Saw kerf was formerly melted in the Banbury Mixers (SWMU 9), formed into small chunks, and disposed of in the Dust Roll-Off (SWMU 5). However, OEPA considered this to be treatment of waste, and the practice was discontinued in 1992.

Floor sweepings (D005, D006, D007, D008) are accumulated in 1- to 2-cubic-yard metal containers in 12 Solid Waste Accumulation Areas (SWMU 1) throughout the facility. The containers are moved to the Temporary Hazardous Waste Storage Area (SWMU 4) when they become full. The containers are emptied into the Dust Roll-Off (SWMU 5), which is transported to landfills in Belleville, Michigan, or Emelle, Alabama, by either Michigan Disposal or Chemical Waste Management at the end of 90 days.

According to the 1991 Annual Generators Report filed by GenCorp, non-specified hazardous waste solids are accumulated at a rate of 60 tons per year (GenCorp, 1991).

**TABLE 2
SOLID WASTES**

<u>Waste/EPA Waste Code^a</u>	<u>Source</u>	<u>Solid Waste Management Unit^b</u>
Non-specified hazardous waste solids/D005, D006, D007, and D008	Manufacturing process, facility maintenance	1, 4, 5, and 9
Non-specified hazardous waste liquids/D005, D006, D007, and D008	Cooling process, liquid additives	2, 3, 4, and 6
Waste petroleum naphtha/D001	Safety-Kleen parts washer	None
Contaminated waste oils and grease/D005, D006, D007, and D008	Stabilization process, machinery maintenance	2, 3, 4, and 6
Waste oil and grease/NA	Oil skimming process	6
Wastewater/NA	Cooling process, manufacturing process	3, 6, and 8
Empty drums/NA	Raw materials	7

Notes:

- ^a Not applicable (NA) designates nonhazardous waste.
- ^b "None" indicates that the waste stream is not managed on site.

Non-specified hazardous waste liquids containing barium, cadmium, chromium, and lead (D005, D006, D007, and D008) result from product additives. The liquids are initially accumulated in 2-gallon buckets in the Liquid Waste SAAs (SWMU 2). When full, the buckets are placed into 55-gallon drums, which are placed into the Waste Storage Area (SWMU 6) and taken off site at the end of 90 days.

Unusable overheated product is placed into a hot batch tank which contains water. Four of these hot batch tanks are located throughout the facility. When full, the hot batch tanks are taken to the Temporary Hazardous Waste Storage Area (SWMU 4). The cooled, solid product is removed and placed into containers in the Solid Waste Accumulation Areas for floor sweepings and dust collection (SWMU 1), which are stored in the Temporary Waste Storage Area (SWMU 4), and eventually taken to the Waste Storage Area (SWMU 6). The remaining water and the hot batch tank are returned to their original location. When the water in the hot batch tank is no longer usable, it is put into 55-gallon drums and placed in the Waste Storage Area (SWMU 6) until it is taken off site by Research Oil, Inc., in Cleveland, Ohio (GenCorp, 1991). Although analysis of this water has not shown the presence of hazardous substances, GenCorp treats it as hazardous because it comes into contact with the product, which contains barium, cadmium, chromium, and lead.

The final source of non-specified hazardous waste liquid is the Oil-Water Separators (SWMU 3). Water from cooling processes enters the Oil-Water Separator, where it separates into oil and water phases. The water settles to the bottom of the tanks, and the oil is skimmed from the surface of the tank by using a weir system. It is then stored into the Liquid Waste SAAs (SWMU 2). Water exits out the bottom of the tank and is stored in the Oil-Contaminated Water Storage Tank (SWMU 8).

According to the 1991 Annual Generator's Report, the GenCorp facility generates non-specified hazardous waste liquids at a rate of about 15,500 pounds per year.

Waste petroleum naphtha (D001) is generated from parts cleaning in a Safety-Kleen Corporation (Safety-Kleen) parts washer. The waste is manifested off site to Safety-Kleen in Wheeling, West Virginia (GenCorp, 1991). The 1991 Annual Generator's Report reported waste petroleum naphtha generated at a rate of 688 pounds per year.

Contaminated waste oils and grease (D005, D006, D007, and D008) are generated from two sources at GenCorp. The first is from the stabilization process, which results in waste soybean oil (D005, D006, D007, and D008). This soybean oil is accumulated in Liquid Waste SAAs (SWMU 2) near the banbury mixers. The oil is accumulated in 2-gallon buckets. When the

buckets are full, they are emptied into 55-gallon drums and placed in the Temporary Hazardous Waste Storage Area (SWMU 4). Eventually these drums are taken to the Waste Storage Area (SWMU 6), pending transport off site. Contaminated oil and grease (D005, D006, D007, and D008) is also generated when process machinery is cleaned, which occurs several times a year. This oil and grease is placed in 55-gallon drums and stored in the Waste Storage Area (SWMU 6). Nonhazardous waste oils and grease are also generated from oil skimmings. Oil-contaminated water from various facility processes is stored in a 6,000-gallon aboveground storage tank (SWMU 8). Oil is skimmed from the water before it is discharged to the NPDES outfall. The skimmings are emptied into 55-gallon drums and stored in the Waste Storage Area (SWMU 6). All waste oils and grease are accepted by either OHM Resource Recovery Corporation of Morrow, Georgia, or by Chem-Met Service of Wyandotte, Michigan (GenCorp, 1991).

Empty raw material drums are stored in the Empty Drum Storage Area (SWMU 7). Drums from this area are used for waste storage.

2.4 HISTORY OF DOCUMENTED RELEASES

There have been no documented releases from the GenCorp facility.

2.5 REGULATORY HISTORY

In August 1980, GenCorp filed a Notification of Hazardous Waste Form with EPA (GenCorp, 1980). A Part A permit application was filed in April 1981, identifying GenCorp as a treatment, storage, or disposal (TSD) facility with the treatment and storage of waste in containers (GenCorp, 1981). The application listed D006 and D008 wastes, with a total estimated quantity of 640,000 pounds. The application listed the following process codes and capacities: S01 for the Waste Storage Area (SWMU 6) (5,500 gallons and 50 cubic yards), and T04 (5,500 gallons). The facility encapsulated waste solids into resin for disposal in a conventional sanitary landfill. The facility abandoned the encapsulation process in 1981 because it was more economical to dispose of wastes in a hazardous waste landfill. GenCorp did not request a change in its Part A permit, so that the encapsulation process could remain a waste disposal alternative.

In February 1983, Gencorp requested withdrawal of its Part A permit application (OEPA, 1983a). In 1985, OEPA acknowledged that GenCorp had certified that hazardous waste activity at the facility did not require a permit. OEPA granted a status change to that of a generator of hazardous waste with less than 90-day storage (OEPA, 1985). No documentation is available indicating that the Waste Storage Area (SWMU 6) underwent RCRA closure or if EPA approved the status change.

In May 1992, following an OEPA compliance evaluation inspection, GenCorp was cited for treatment of hazardous waste without a permit. GenCorp was melting waste saw kerf into a solid product for easier disposal into a landfill. GenCorp felt that this was a feasible alternative to disposing of shavings. OEPA stated that altering the physical state of the waste was not permissible and was considered treatment. In November 1992, GenCorp agreed to permanently discontinue the practice, and OEPA returned the facility to compliance (OEPA, 1992).

Compliance inspections were conducted at the facility in 1981, 1982, 1983, 1988, and 1992. Except for the 1992 inspection, minor violations were noted which pertained mainly to equipment testing, frequency of inspections, contingency plan deficiencies, waste evaluation data, personnel training, and improperly completed manifest documents. These deficiencies were corrected and no orders were issued by OEPA (OEPA 1981, 1982, 1983b, 1988).

GenCorp possesses 13 air permits for the calenders, extruders, and banbury mixers. These permits are for registration status only and have no expiration date (GenCorp, 1981). The facility has no history of odor complaints from area residents.

GenCorp possesses a National Pollutant Discharge Elimination System (NPDES) permit, which was renewed in 1991. This permit authorizes non-contact cooling water and storm water runoff to be discharged from the plant through an outfall to an unnamed tributary of the Tuscarawas River, located about 100 feet east of the facility. This tributary flows into the Tuscarawas River about 0.25 mile south of the facility. The discharge is monitored daily for temperature, flow rate, and total residual chlorine. Total oil and grease and pH are monitored weekly through grab sampling. Total cadmium and total zinc are monitored quarterly by 24-hour composite sampling (OEPA, 1991b). No permit violations have been recorded.

No past or present record exists of underground storage tanks at the facility. Available information does not indicate that any CERCLA activity has taken place at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Tuscarawas County is continental and humid, with moderately cold winters and warm humid summers. The average daily temperature is 51.6 degrees Fahrenheit (°F). The lowest average daily temperature is 31°F in February. The highest average daily temperature is 73.2°F in July. The total annual precipitation of the county is 39.12 inches. The 1-year, 24-hour maximum rainfall is about 3.4 inches, and the mean annual lake evaporation is 32 inches (USDA, 1956). PRC could not determine the prevailing wind direction.

2.6.2 Flood Plain and Surface Water

An unnamed tributary of the Tuscarawas River marks the eastern border of the GenCorp facility and flows into the Tuscarawas River about 0.25 mile south of the facility. This tributary is used mainly for storm and industrial water discharge and receives all surface water runoff from the facility. The Tuscarawas River is used for recreational purposes. The GenCorp facility lies in the 100-year flood plain of the Tuscarawas River (National Flood Insurance Program, 1976).

2.6.3 Geology and Soils

Tuscarawas County lies on the western portion of the Allegheny Plateau. Bedrock in the area consists of Pennsylvanian-age, interbedded sandstone, siltstone, shale, and limestone of the Allegheny and Conemaugh formations (USDA, 1956). Bedrock in the area is about 150 feet below ground surface (bgs) (ODNR, 1993). Glacial materials in Tuscarawas County were deposited as a result of the Wisconsin glacial period during the Pleistocene era. Glacial deposits at the GenCorp facility consist of the following materials in descending order (ODNR, 1993):

- 0 to 2 feet: Fill, sand, gravel, clay, and organic debris
- 2 to 20 feet: Clay with interbedded sand and gravel lenses
- 20 to 100 feet: Sand and gravel with clay

Area soils are of the Chenango loam complex, formed from glaciofluvial outwash terraces. These soils are well- to excessively well-drained and relatively low in organic matter (USDA, 1956).

2.6.4

Ground Water

Depth to ground water in the area is about 12 feet bgs (ODNR, 1993). The GenCorp facility lies over glacial deposits capable of yielding 500 to 1,000 gallons of water per minute (ODNR, 1962). Ground-water flow is generally south, toward the Tuscarawas River; recharge is from surface infiltration (PRC, 1993). The nearest drinking water well is part of the Newcomerstown municipal wellfield, about 0.5 mile southwest and downgradient of the facility (PRC, 1993). This well is one in a series of four wells used for the Newcomerstown municipal system. It is screened in sand and gravel at 123 feet bgs (ODNR, 1993). The GenCorp facility has three industrial wells which are used for process and sanitary water.

2.7

RECEPTORS

GenCorp occupies 23 acres in a mixed-use area in Newcomerstown, Ohio. The village of Newcomerstown has a population of about 4,000 (U.S. Department of Commerce, 1991).

As mentioned in Section 2.1, the facility is bordered to the north by State Route 36, to the east by an unnamed tributary of the Tuscarawas River, to the south by Penn Central Railroad tracks, and to the west by a residential area which includes a nursing home. The nearest residence is about 500 feet west of the facility. The nearest school is about 0.75 mile southwest of the facility.

Access to the facility is restricted by a 6-foot-high, chain-link fence. The fence has two drive-through gates, one railroad gate, and two walk-through gates. These are monitored 24 hours a day by security personnel and television cameras.

The nearest surface water body is an unnamed tributary of the Tuscarawas River, located about 100 feet east of the GenCorp facility. It is used primarily for storm and industrial water discharge. This unnamed tributary flows into the Tuscarawas River about 0.25 mile south of the facility. The Tuscarawas River is used primarily for recreational purposes. No known drinking water intakes are located on the Tuscarawas River upstream or downstream of the facility (PRC, 1993).

Ground water is used for industrial and municipal drinking water supplies. The nearest drinking water wells are in the Newcomerstown municipal well field, located about 0.5 mile southwest of the facility. These wells are believed to be downgradient of the GenCorp facility. The facility has three on-site industrial wells. Two of these are used for industrial and sanitary

water, and the third is used as a backup. The wells are about 100 feet bgs and are screened in sand and gravel (ODNR, 1993).

No sensitive environments are located on site. The Cy Young Memorial Park and a reservoir are located about 0.25 mile northwest of the GenCorp facility (USGS, 1972).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the nine SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1

Solid Waste Accumulation Areas (18)

Unit Description:

The Solid Waste Accumulation Areas are located indoors, throughout the GenCorp facility (see Figure 2). These areas accumulate non-specified hazardous waste solids containing barium, chromium, cadmium, and lead from floor sweepings, dust collection, and saw kerf in 1- to 2-cubic-yard metal containers.

Date of Startup:

Most of the Solid Waste Accumulation Areas used for floor sweepings began operation in 1980. The exceptions to this are the three Solid Waste Accumulation Areas under the banbury mixers, which were not established until 1992. The Solid Waste Accumulation Areas which accumulate dust were established in 1980. The saw kerf Solid Waste Accumulation Area was established in 1980.

Date of Closure:

All Solid Waste Accumulation Areas are active.

Wastes Managed:

This unit stores non-specified hazardous waste solids containing barium (D005), cadmium (D006), chromium (D007), and lead (D008) resulting from floor sweepings, dust collection, and saw kerf accumulation. Wastes from these areas are ultimately shipped off site for disposal.

Release Controls:

The waste is accumulated in large plastic bags which are placed in 1- to-2-cubic-yard containers. The plastic bags are sealed except when being used.

History of Documented Releases:

No history of releases is documented from these areas.

Observations: During the VSI, the containers and bags were in sound condition. PRC noted no evidence of leaks or spills (See Photograph Nos. 1 and 2).

SWMU 2 Liquid Waste SAAs (3)

Unit Description: The Liquid Waste SAAs are located indoors, throughout the facility. These are 2-gallon plastic buckets and 55-gallon drums used to store waste soybean oil used in the stabilization process and non-specified hazardous waste liquids from cooling and mixing.

Date of Startup: The SAAs began operating in 1980.

Date of Closure: They are active.

Wastes Managed: This unit temporarily stores non-specified hazardous waste liquids (D005, D006, D007, and D008) from cooling and mixing and contaminated waste oil (D005, D006, D007, and D008) from the stabilization process before they are transported off site.

Release Controls: The containers are on top of concrete floors. No floor drains were noted in the vicinity of these SWMUs.

History of Documented Releases: No releases have been documented from these units.

Observations: During the VSI, the containers were in sound condition and displayed no signs of deterioration. PRC observed no evidence of release (See Photograph Nos. 3 and 4).

SWMU 3 Oil-Water Separators

Unit Description: Three Oil-Water Separators are located indoors, throughout the facility. These are metal containers which hold about 250 gallons of oil-contaminated water, which is skimmed off of the surface and stored in the Liquid Waste SAAs (SWMU 2).

Date of Startup: This unit began operation in 1980.

Date of Closure: The unit is active.

Wastes Managed: This unit skims non-specified hazardous waste liquids from wastewater. The non-specified hazardous waste liquids are drained into the Liquid Waste SAAs (SWMU 2), which are taken to the Waste Storage Area (SWMU 6). The wastewater is pumped to the Oil-Contaminated Water Storage Tank (SWMU 8).

Release Controls: The unit is indoors, on top of concrete. No floor drains were noted in the vicinity of these SWMUs.

History of Documented Releases: No releases have been documented from the unit.

Observations: During the VSI, the unit was in sound condition. PRC noted no evidence of stains or releases.

SWMU 4 Temporary Hazardous Waste Storage Area

Unit Description: The Temporary Hazardous Waste Storage Area is an open area measuring about 15 feet by 15 feet located in the southeast corner of the facility. It is used for the temporary storage of all solid and liquid hazardous wastes before they are taken to the appropriate SWMUs.

Date of Startup: This unit began operation in 1980.

Date of Closure: The unit is active.

Wastes Managed: This unit temporarily stores all containerized non-specified hazardous waste solids and liquids generated inside the facility before they are moved to either the Dust Roll-Off (SWMU 5) or the Waste Storage Area (SWMU 6). This includes all wastes from the Solid Waste Accumulation Areas (SWMU 1) and Liquid Waste SAAs (SWMU 2).

Release Controls:	The unit is equipped with a spill control cart which contains neutralizing and wetting agents. It is in an open corner of the facility on top of a concrete floor. It is neither fenced nor bermed. The area is inspected weekly for spills and leaks.
<hr/>	
History of Documented Releases:	No releases have been documented from the unit.
Observations:	During the VSI, the unit was in sound condition. PRC noted no evidence of stains or releases. No waste was noted in the unit.
SWMU 5	Dust Roll-Off
Unit Description:	The Dust Roll-Off is a 30-cubic-yard metal container located outdoors on the southeastern corner of the facility property. It rests on a paved area and is covered with a tarp.
Date of Startup:	The unit began operation in 1980.
Date of Closure:	The unit is active.
Wastes Managed:	This unit stores all non-specified hazardous waste solids (D005, D006, D007, and D008) including floor sweepings, dust, and saw kerf. Every 90 days the unit is transported off site for disposal and replaced with a new roll-off.
Release Controls:	The unit sits on top of a paved area and is covered with a waterproof tarp to prevent water from entering and dust from escaping. Wastes are not placed into the unit unless weather permits.
History of Documented Releases:	No releases have been documented from the unit.
Observations:	The unit was in sound condition during the VSI (see Photograph No. 5) . PRC observed no cracks in paving or evidence of release from the unit.

SWMU 6**Waste Storage Area****Unit Description:**

The Waste Storage Area is located outdoors, on the southeastern portion of the facility. The area is partially elevated and surrounded by a chain-link fence. It is covered by a metal roof and is kept locked. The concrete base is surrounded by a 4-inch-high concrete berm. A double-wide concrete berm separates the area into a north section and a south section, each measuring about 15 feet by 15 feet. The unit stores 55-gallon drums on wooden pallets.

Date of Startup:

The unit began operation in 1980.

Date of Closure:

The unit is active. It has not undergone RCRA closure but has not stored waste for greater than 90 days since about 1985.

Wastes Managed:

The north portion of the Waste Storage Area holds all contaminated waste oil and grease from facility operations. The south portion of the Waste Storage Area holds all nonhazardous waste oil and grease from the oil skimming process. All wastes from this unit are transported off site for disposal.

Release Controls:

This unit has an unsealed concrete base, is bermed, and is surrounded by a locked fence. It is also elevated from the surrounding area.

**History of
Documented Releases:**

No releases from this unit have been documented.

Observations:

During the inspection, PRC observed no evidence of spills or leaks. The north portion of the area contained about 40 drums of non-specified hazardous waste liquids (see Photograph No. 6). The south portion contained four drums of nonhazardous waste oil and grease (see Photograph No. 7).

SWMU 7**Empty Drum Storage Area****Unit Description:**

This unit is outdoors, along the southeast exterior wall of the facility. It consists of a 25-foot by 10-foot fenced area with a gravel base. The unit stores empty 55-gallon drums that contained raw materials used in the manufacturing process. Empty drums are stored two deep and three high on wooden pallets which separate each layer of drums.

Date of Startup:

The unit began operations about 1980.

Date of Closure:

The unit is active.

Wastes Managed:

The unit stores empty drums that contained raw materials used in the manufacturing process.

Release Controls:

The unit is surrounded by a locked fence. Drums sit on top of wooden pallets. The area is not paved.

History of Documented Releases:

No releases have been documented from this unit.

Observations:

During the inspection, PRC observed no signs of leakage. The unit held about 40 empty drums (see Photograph No. 8).

SWMU 8**Oil-Contaminated Water Storage Tank****Unit Description:**

This unit is a metal, aboveground storage tank with a capacity of 6,000 gallons. It is located outdoors, on the northeast interior wall of the facility. It sits on a paved, diked area and is equipped with a high-level alarm.

Date of Startup:

The unit began operations about 1980.

Date of Closure:

The unit is active.

Wastes Managed:

The unit stores oil-contaminated water from various facility operations. Oil is skimmed from the water, and the water is then

discharged to the NPDES outfall. The oil is containerized and placed in the Waste Storage Area (SWMU 6) until it is shipped off site.

Release Controls: The unit is surrounded by a concrete dike. It rests on a paved area and is equipped with a high-level alarm. Booms at the POTW outfall absorb any oil not removed by the skimmers.

History of Documented Releases: No releases have been documented from this unit.

Observations: During the inspection, the unit was in sound condition. PRC observed no evidence of spills or leakage. PRC did not observe any oily sheen at the outfall.

SWMU 9 Banbury Mixers

Unit Description: Three Banbury Mixers are located in the facility. They are metal containers currently used to mix raw materials used in the plastic production process. They were formerly used for both the production process and to melt waste saw kerf into chunks.

Date of Startup: The mixers began operating in 1955.

Date of Closure: They are active.

Wastes Managed: The unit currently mixes raw materials used in the manufacturing process. It was formerly used to melt waste saw kerf into liquid, which was cooled into small chunks for easier disposal.

Release Controls: The unit rests on top of a metal platform. A concrete floor is beneath the platform.

History of Documented Releases: No releases have been documented from this unit.

Observations: During the inspection, the unit was in sound condition. PRC observed no evidence of spills or leakage on both the metal platform and the concrete floor.

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified nine SWMUs and no AOCs at the GenCorp facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1 Solid Waste Accumulation Areas (18)

Conclusions: All Solid Waste Accumulation Areas are indoors, on top of concrete. Each container can hold a maximum of 2 cubic yards of waste. Because all wastes are accumulated indoors, in containers, this unit has a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU.

SWMU 2 Liquid Waste SAAs (3)

Conclusions: All Liquid Waste SAAs are indoors, on top of concrete. PRC observed no evidence of spills or leaks from any of these containers. Because wastes are stored indoors, in containers, this unit has a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU.

SWMU 3 Oil-Water Separators (3)

Conclusions: All Oil-Water Separators are indoors, on top of concrete. PRC observed no evidence of spills or leaks from any of these containers. Because the unit is indoors, on top of concrete, this unit has a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU.

SWMU 4

Temporary Hazardous Waste Storage Area

Conclusions:

The Temporary Hazardous Waste Storage Area is an open area on a concrete floor inside the facility. All hazardous wastes stored at this SWMU are already containerized. The unit is equipped with preventative measures in the event of a spill. PRC did not observe any signs of spills or leaks during the VSI. Because the unit manages containerized waste and is surrounded by concrete, the potential for release to ground water, surface water, air, and on-site soils is low.

Recommendations:

PRC recommends no further action for this SWMU.

SWMU 5

Dust Roll-Off

Conclusions:

The Dust Roll-Off is staged outdoors near the southeastern corner of the facility. The roll-off is kept on a level blacktop area. It is covered with a waterproof tarp, and wastes are put into the container only when weather permits. The unit has a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations:

PRC recommends no further action for this SWMU.

SWMU 6

Waste Storage Area

Conclusions:

The Waste Storage Area is located outdoors, in the southeast corner of the facility. The unit measures about 30 feet by 30 feet and has an elevated, bermed concrete pad. The area is surrounded by a locked fence and has a metal roof. PRC observed no evidence of leaks or spills. Because the unit manages containerized waste and is surrounded by concrete, the potential for release is low.

Recommendations:

PRC recommends the facility submit a closure plan to OEPA for this SWMU.

SWMU 7

Empty Drum Storage Area

Conclusions:

The Empty Drum Storage Area is located outdoors, along the eastern wall of the facility. The unit sits on top of a paved area. It measures about 25 feet by 10 feet and is surrounded by a locked fence. The empty drums sit on top of wooden pallets. The unit has a low potential for release.

Recommendations:

PRC recommends no further action for this SWMU.

SWMU 8

Oil-Contaminated Water Storage Tank

Conclusions:

The Oil-Contaminated Water Storage Tank is located on the northwestern side of the facility. It has the capacity to store up to 6,000 gallons of oil-contaminated water. It is diked and equipped with a high-level alarm. Oil is skimmed from the water, and the water is then discharged to the local POTW. Booms at the outfall absorb any oil not removed by the skimmers. During the VSI, PRC observed no oily sheen at the outfall. The unit has a low potential for release due to adequate secondary containment.

Recommendations:

PRC recommends no further action at this SWMU.

SWMU 9

Banbury Mixer (3)

Conclusions:

The Banbury Mixers are located indoors, on top of concrete. Since the facility's opening, they have been used to combine raw materials for the manufacturing process. They are no longer used to treat hazardous wastes. They rest on a metal platform which is on top of a concrete floor. During the VSI, PRC observed no evidence of release, leaks, or stains at these units.

Recommendations:

PRC recommends no further action at this SWMU.

TABLE 3
 SWMU SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Solid Waste Accumulation Areas	1980 to present	None	None
2. Liquid Waste SAAs	1980 to present	None	None
3. Oil-Water Separator	1980 to present	None	None
4. Temporary Hazardous Waste Storage Area	1980 to present	None	None
5. Dust Roll-Off	1980 to present	None	None
6. Waste Storage Area	1980 to present	None	Submit a closure plan to OEPA for the unit.
7. Empty Drum Storage Area	1980 to present	None	None
8. Oil-Contaminated Water Storage Area	1980 to present	None	None
9. Banbury Mixers (3)	1955 to present	None	None

REFERENCES

- GenCorp Polymer Products (GenCorp), 1980. Notification of Hazardous Waste Activity Form, August 30.
- GenCorp, 1981. Part A Permit Identifying GenCorp as a Treatment, Storage, and Disposal Facility, April 16.
- GenCorp, 1990. Contingency Plan.
- GenCorp, 1991. Annual Generator's Report.
- National Flood Insurance Program, 1976. Flood Plain Map of Newcomerstown, Ohio.
- Ohio Department of Natural Resources - Division of Water (ODNR), 1962. Underground Water Resources of the Lower Tuscarawas River Basin.
- ODNR, 1993. Well Logs of Tuscarawas County, Ohio.
- Ohio Environmental Protection Agency (OEPA), 1981. Letter from Patrick Gorman to Cliff McDonald, GTR Plastic Film Company, May 20.
- OEPA, 1982. Letter from Brian Blair to Arthur Maupin, Gen Corp, July 23.
- OEPA, 1983a. Telephone Record of Discussion of GenCorp Part A Permit Application Withdrawal, February 14.
- OEPA, 1983b. Letter from Brian Blair to Arthur Maupin, GenCorp, April 19.
- OEPA, 1985. Letter from Thomas Crepeau to H.J. Kalbas, GenCorp, April 1.
- OEPA, 1988. Letter from Brian Blair to William Sterret, GenCorp, August 8.
- OEPA, 1991. Authorization to Discharge Under the National Pollutant Discharge Elimination System, October 9.
- OEPA, 1992. Letter from Jeffery Smith to Bob Young, GenCorp, November 10.
- PRC Environmental Management, Inc. (PRC), 1993. Telephone Conversation between Tom Davis Newcomerstown Water Department, and Christine Hirschman, January 6.
- U.S. Department of Agriculture (USDA), 1956. Soil Survey of Tuscarawas County.
- U.S. Department of Commerce, 1991. Population Survey of Ohio.
- U.S. Geological Survey, 1972. 7.5 Minute Series Topographic Map, Newcomerstown Quadrangle.

ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE
OH

02 SITE NUMBER
OHD046630679

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)
GenCorp Polymer Products

02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER
One General Street

03 CITY
Newcomerstown

04 STATE
OH

05 ZIP CODE
43832

06 COUNTY
Tuscarawas

07 COUNTY
CODE

08 CONG
DIST

09 COORDINATES: LATITUDE
40° 16' 44" N | LONGITUDE
81° 35' 23" W

10 DIRECTIONS TO SITE (Starting from nearest public road)

From State Route 36 take a left onto Pilling Street. General Street is the first street on the left. The facility is at the end of the street.

III. RESPONSIBLE PARTIES

01 OWNER (if known)
GenCorp Polymer Products

02 STREET (Business, mailing residential)
350 Springside Drive

03 CITY
Akron

04 STATE
OH

05 ZIP CODE
44333

06 TELEPHONE NUMBER
(216) 668-7075

07 OPERATOR (if known and different from owner)
GenCorp Polymer Products

08 STREET (Business, mailing, residential)
One General Street

09 CITY
Newcomerstown

10 STATE
OH

11 ZIP CODE
43832

12 TELEPHONE NUMBER
(614) 498-5900

13 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE

☐ B. FEDERAL:

(Agency Name)

☐ C. STATE

☐ D. COUNTY

☐ E. MUNICIPAL

☐ F. OTHER

(Specify)

☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☐ A. RCRA 3010 DATE RECEIVED: 08/ 04/ 80
MONTH DAY YEAR

☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: / /
MONTH DAY YEAR

☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

BY (Check all that apply)

☒ YES
☐ NO

DATE

☐ A. EPA

☒ B. EPA CONTRACTOR

☐ C. STATE

☐ D. OTHER CONTRACTOR

☐ E. LOCAL HEALTH OFFICIAL

☐ F. OTHER:

(Specify)

CONTRACTOR NAME(S): PRC Environmental Management, Inc.

02 SITE STATUS (Check one)

☒ A. ACTIVE

☐ B. INACTIVE

☐ C. UNKNOWN

03 YEARS OF OPERATION

1955 | present
BEGINNING YEAR ENDING YEAR

☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

GenCorp generates non-specified hazardous waste solids and liquids containing barium (D005), cadmium (D006), chromium (D007) and lead (D008).

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

The potential hazard to the surrounding environment and population is very low.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)

☐ A. HIGH

(Inspection required promptly)

☐ B. MEDIUM

(Inspection required)

☐ C. LOW

(Inspect on time-available basis)

☐ D. NONE

(No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT
Kevin Pierard

02 OF (Agency/Organization)
U.S. EPA

03 TELEPHONE NUMBER
(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT
Christine Hirschman

05 AGENCY
U.S. EPA

06 ORGANIZATION
PRC

07 TELEPHONE NUMBER
(513) 241-0149

08 DATE
01/ 29/ 93
MONTH DAY YEAR

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

**GenCorp Polymer Products
One General Street
Newcomerstown, Ohio 43832
OHD 046 630 679**

Date: December 9, 1992

Primary Facility Representative: Bob Young, Project Engineer
Representative Telephone No.: (614) 498-5900

Additional Facility Representatives: Ralph Sulser, Plant Manager
Don Norman, Process Engineer
Ralph Conner, Safety/Environmental Engineer
Tom Grabski, New Product Development Manager
William Prior, Director of Environmental Affairs

PRC Inspection Team: Pete Zelinskas, PRC Environmental Management, Inc.
(PRC)
Christine Hirschman, PRC

Photographer: Christine Hirschman

Weather Conditions: Clear, 30°F

Summary of Activities: The visual site inspection (VSI) began at 9:00 with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tour began at 10:20 a.m. and involved a walk-through tour of the facility. PRC observed the manufacturing, storage, and shipping areas. PRC examined the concrete floor throughout the facility and noted that it was structurally sound and free of stains. PRC also observed the exterior of the facility, including the Dust Roll-Off (SWMU 5), and the Waste Storage Area (SWMU 6).

The tour concluded at 11:15 a.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 11:40 a.m.



Photograph No. 1
 Orientation: West
 Description: Solid Waste Accumulation Area for dust (SWMU 1)

Location: SWMU 1
 Date: 12/09/92



Photograph No. 2
 Orientation: East
 Description: Solid Waste Accumulation Area for dust (SWMU 1)

Location: SWMU 1
 Date: 12/09/92



Photograph No. 3
 Orientation: East
 Description: Liquid Waste SAA (SWMU 2)

Location: SWMU 2
 Date: 12/09/92



Photograph No. 4
 Orientation: West
 Description: Oil-Water Separator (SWMU 3) and Liquid Waste SAA (SWMU 2)

Location: SWMU 2 and SWMU 3
 Date: 12/09/92



Photograph No. 5
 Orientation: West
 Description: Dust Roll-Off (SWMU 5)

Location: SWMU 5
 Date: 12/09/92



Photograph No. 6
 Orientation: West
 Description: Northern portion of Waste Storage Area (SWMU 6)

Location: SWMU 6
 Date: 12/09/92



Photograph No. 7
 Orientation: West
 Description: Southern portion of Waste Storage Area (SWMU 6)

Location: SWMU 6
 Date: 12/09/92



Photograph No. 8
 Orientation: East
 Description: Empty Drum Storage Area (SWMU 7)

Location: SWMU 7
 Date: 12/09/92

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

10-
12 P.E.

4-13 P.E.

12-9-92

VST at GenCorp Corp.

Newcomerston, OH

CHD 046 630 679

Facility Contact: Bob Young

Conditions: Clear

30°F.

DRC Inspectors:

Pete Zelinoskas

Christine Hershman-Rodas

0900 Clear 2:30 P.M.

Find for interior status.

See handout for procedures.

Basic operation has remained the same. Fabrication.

History - See handout 1 bucket water wells on site. In use cooling water, sanitary.

NPDES - cooling water, storm.

Let's go. Submit 12-9-92

12
HPZ

water.

for permits x 12-14

1 full ~ 13 registration

→ unloading area.

waste generation

DOES, DOCK, DOOT, DOOS

Dust collectors - bag houses

* Safety Klean - mineral spirits
naptha, 1 unit

* Waste hydraulic fluids

recycle, ~~the~~ Research Oil

waste storage area,

Fence around operating area

3 shifts - 100 employees

* Asked about 1985 letter from

GEBA not here.

1020 * Satellite accumulation

areas 4 units

oil coming off of

Letter. Schedule 12-9-82

15

machines. Dust collectors #2

18 of these 1 cubic yard.

* Floor drains → boiler

oil/water separators →

ponds.

* Oil/water separator

* Clean equipment in

area. no oil/water separator

* Dust collection unit near

compressed area

* UDD'S, beams, thermocouple

* Molt off. Beval's dust

* Hazardous waste area

Box 20 Burned and

slipped. No cracks shown

rooted, 10 foot fence

12 years. Root 1992.

* Paid for roll-off concrete

reinforced. 20 x 20 ft.

Letter. Schedule 12-9-82

14

16.07.77 Computer refuse

1975

* Boiler area.

* Catch basin for oil

escaping press units

oil usually caught in

drum. This is a safety

feature.

water level at about 10 ft.

1115

Supplying maps of facility,

information. Looking

into getting rid of cadmium.

Putting out a lot of

effort to rid facility

of hazardous.

* Newcomer down on wells.

Check this.

Facility bordered by

cuttings here to hazard

Det. J. J. J. 12.9.77

15

17.7.77

and highway.

Have indicated that we will

probably be conducting the

activity with further

questions.

Group attendees:

Ralph Essex

Bob Young

Ralph Connor

Donald Norman

William Dyke

1140 DRC exiting facility

~~Det. J. J. J. 12.9.77~~

SEP 5 1985

Mr. Chris Bowers
 Ohio Environmental Protection
 Agency - DSHWM
 361 East Broad St.
 P.O. Box 1049
 Columbus, Ohio 43216-1049

Re: Corrective Action Response Review
 DiversiTech General, Inc.
 EPA I.D. #: OHD 046 630 679

Dear Mr. Bowers:

Enclosed is a copy of information we received from the referenced facility, addressing the "continuing release" provisions of the Hazardous and Solid Waste Amendments of 1984. Please review this information, and complete the enclosed form entitled "RCRA Facility Review for Solid Waste Management Units." We also encourage you to provide us any and all additional information that is pertinent to a consideration of continuing releases at this facility. We will take no final actions concerning this facility without your full participation in the decision-making process.

Please feel free to call the previously identified permit writer during the progress of your review with any questions or comments.

Sincerely yours,

Daniel J. Banaszek, Chief
 Ohio Unit, Solid Waste Branch

Enclosure

cc: SEDO - Steve Hamlin

bcc: Lisa Pierard

Jn

	TYP.	AUTH.	IL. CHIEF	IN. CHIEF	ML. CHIEF	REG. CHIEF	OH. CHIEF	TPS CHIEF	WMD CHIEF	WMS CHIEF
INT. DATE	<i>9/4/85</i>	<i>SP</i>					<i>Mr. ch</i>			
	<i>9-5-85</i>						<i>9/5/85</i>			